

ESTTA Tracking number: **ESTTA754596**

Filing date: **06/24/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91198660
Party	Plaintiff Broadcom Corporation
Correspondence Address	SUSAN M NATLAND KNOBBE MARTENS OLSON BEAR LLP 2040 MAIN STREET, 14TH FLOOR RVINE, CA 92614 UNITED STATES efiling@kmob.com, pam.pascual@kmob.com
Submission	Motion for Summary Judgment
Filer's Name	Susan M. Natland
Filer's e-mail	efiling@knobbe.com
Signature	/susan m. natland/
Date	06/24/2016
Attachments	Motion for Summary Judgment - BROCC.783M.pdf(1134622 bytes) MSJ - S Natland Declaration - BROCC.783M.pdf(163998 bytes) Exhibit A - Facts at a Glance.pdf(304004 bytes) Exhibit B - Broadcom.pdf(137422 bytes) Exhibit C - Broadchip.pdf(339404 bytes) Exhibit D - Broadchip screenshot.pdf(107070 bytes) Exhibit E - CONNECTING EVERYTHING tsdr pages.pdf(250332 bytes) Exhibit F - BCM4329.pdf(204948 bytes) Exhibit G - Opposer Req for Admissions.pdf(1100393 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Broadcom Corporation,

Opposer,

v.

Broadchip Technology Group Ltd.,

Applicant.

Opposition No.: 91198660

Subject Mark: BROADCHIP

Application No.: 77/855,572

OPPOSER’S MOTION FOR SUMMARY JUDGMENT

Opposer, Broadcom Corporation (“Broadcom” or “Opposer”), pursuant to Federal Rule of Civil Procedure 56 and TBMP § 528, hereby moves the Trademark Trial and Appeal Board (the “Board”) for entry of summary judgment in its favor. In support of its motion, Opposer submits this supporting memorandum together with the accompanying declaration of Susan M. Natland and the exhibits thereto.

Further, pursuant to TBMP § 528, Broadcom hereby moves the Board to suspend the opposition proceeding pending a decision on the subject motion.

TABLE OF CONTENTS

	Page No.
I. INTRODUCTION AND SUMMARY OF BROADCOM’S ARGUMENT.....	1
II. STATEMENT OF FACTS	2
A. Broadcom and its trademarks and registrations for BROADCOM and other BROAD-inclusive marks	2
B. Broadchip and its trademark application for the BROADCHIP mark	4
C. The subject opposition proceeding	7
1. Broadchip failed to respond to Broadcom’s discovery requests.....	7
2. Broadcom’s Motion for Sanctions and the Board’s Order Granting Broadcom’s Motion for Sanctions	8
III. ARGUMENT	9
A. Standard for Summary Judgment	9
B. Broadcom’s Requests for Admissions are conclusively admitted and established	9
C. The BROADCHIP application should be refused pursuant to Section 2(d) of the Lanham Act.....	10
1. Broadcom has standing.....	10
2. Broadcom has priority	11
3. The BROADCHIP mark is likely to cause confusion with Broadcom’s Marks	12
a. Broadcom’s Marks are strong and famous.....	13
b. The BROADCHIP mark is similar to Broadcom’s BROADCOM and BROAD-containing marks in appearance, sound and commercial impression.....	13
c. Broadchip’s goods and services are identical and related to Broadcom’s goods and services.....	14
d. The parties’ trade channels and customers overlap	16

TABLE OF CONTENTS
(cont'd.)

	Page No.
e. The types of purchasers of the goods and services covered under Broadcom's Registrations and the BROADCHIP application could be confused	17
f. Broadchip intended to ride off the goodwill of Broadcom	18
g. There has been actual marketplace confusion between the BROADCHIP mark and Broadcom's Marks	20
IV. CONCLUSION	21

TABLE OF AUTHORITIES

	Page No(s).
<i>In re Avamar Technologies, Inc.</i> , Serial No. 78/153,324 at pp. 7-8 (T.T.A.B. September 29, 2005).....	16
<i>CAE</i> , 60 USPQ2d at 1464.....	18
<i>Carlisle Chem. Works, Inc. v. Hardman & Holden Ltd.</i> , 168 USPQ 110 (C.C.P.A. 1970)	17
<i>Cunningham v. Laser Golf Corp.</i> , 55 U.S.P.Q.2d 1842 (Fed. Cir. 2000).....	9
<i>Design v. Berkshire Prods. Inc.</i> , 1 U.S.P.Q.2d 1323 (T.T.A.B. 1986).....	10
<i>In re E. I. du Pont de Nemours & Co.</i> , 177 U.S.P.Q. at 567.....	<i>passim</i>
<i>Giant Food, Inc. v. Nation’s Foodservice, Inc.</i> , 218 U.S.P.Q. 390 (Fed. Cir. 1983).....	20
<i>Herbko Int’l, Inc. v. Kappa Books, Inc.</i> , 64 U.S.P.Q.2d 1375 (Fed. Cir. 2002).....	11
<i>Hewlett-Packard Dev. Co. v. Vudu, Inc.</i> , 92 U.S.P.Q.2d 1630(T.T.A.B. 2009).....	9
<i>In re Iolo Technologies, LLC</i> , 95 U.S.P.Q. 2d 1498 (T.T.A.B. 2010).....	15
<i>Kenner Parker Toys, Inc. v. Rose Art Indus., Inc.</i> , 22 U.S.P.Q.2d 1453 (Fed. Cir. 1992).....	13
<i>King Candy Co. v. Eunice King’s Kitchen, Inc.</i> , 182 U.S.P.Q. 108 (C.C.P.A. 1974)	11
<i>Lipton Indus., Inc. v. Ralston Purina Co.</i> , 213 U.S.P.Q. 185 (C.C.P.A. 1982)	10
<i>In re Majestic Distilling Co.</i> , 65 U.S.P.Q. 2d. 1201 (Fed. Cir. 2003).....	20
<i>In re Melville Corp.</i> , 18 U.S.P.Q.2d 1386 (T.T.A.B. 1991).....	14

TABLE OF AUTHORITIES

(cont'd.)

Page No(s).

<i>Recot, Inc. v. Becton</i> , 54 U.S.P.Q.2d 1894 (Fed. Cir. 2000).....	12, 14
<i>In re Research & Trading Corp.</i> , 230 USPQ 49 (Fed. Cir. 1986).....	17
<i>Research in Motion Ltd. v. Defining Presence Mktg. Group Inc.</i> , 102 USPQ2d 1187 (T.T.A.B. 2012).....	10
<i>Sweats Fashions Inc. v. Pannill Knitting Co.</i> , 4 U.S.P.Q.2d 1793 (Fed. Cir. 1987).....	9
<i>Weeks, Inc. v. Hornblower & Weeks, Inc.</i> , 60 U.S.P.Q.2d 1733 (T.T.A.B. 2001).....	10
<i>X/Open Company Limited v. Chong Teck Choy</i> , Cancellation No. 92057631 at 13-15 (T.T.A.B. May 10, 2016).....	15

OTHER AUTHORITIES

37 C.F.R. § 2.116.....	9
Fed. R. Civ. P. 36.....	8, 9
Fed. R. Civ. P. 56.....	9
15 U.S.C. § 1052.....	12
15 U.S.C. § 1063.....	10
Lanham Act Section 2.....	<i>passim</i>
Trademark Trial and Appeal Board Manual of Procedure § 309.03	11
Trademark Trial and Appeal Board Manual of Procedure § 528.01	9

MEMORANDUM IN SUPPORT OF BROADCOM'S MOTION
FOR SUMMARY JUDGMENT

I. INTRODUCTION AND SUMMARY OF BROADCOM'S ARGUMENT

For over two decades, Broadcom has used the BROADCOM mark in connection with a wide variety of computer chips, computer hardware and software, semiconductors, integrated circuits and other electronic products and technologies, as well as related services, such as design and consulting services related to computer hardware and software, integrated circuits, semiconductors, and communications hardware and software, among others. Over the years, Broadcom has also used a number of other BROAD-containing marks in connection with its goods and services, including the marks BROADRANGE and BROADVOICE.

Against this long history, Applicant, Broadchip Technology Group Ltd. ("Broadchip" or "Applicant"), seeks to register the mark BROADCHIP in connection with goods and services, including computer chipsets and related services, which are identical to and/or related to Broadcom's goods and services.

As set forth below, Broadchip has admitted every fact necessary to prove that its registration and use of the mark BROADCHIP in Application Serial No. 77/855,572 is likely to cause confusion with Broadcom's long-standing and federally-registered BROADCOM mark and other BROAD-containing marks under Section 2(d) of the Lanham Act. Broadcom, therefore, respectfully requests that its motion for summary judgment be granted and that the BROADCHIP application be refused.

II. STATEMENT OF FACTS



A. Broadcom and its trademarks and registrations for BROADCOM and other BROAD-inclusive marks

Broadcom is a semiconductor design and development company that has been operating for over twenty-five years and employs several thousand individuals around the world, more than half of whom are located in the United States. Natland Decl. ¶1. Broadcom's semiconductors and computer chipsets power Internet and wireless communication devices, global positioning equipment, digital televisions, consumer electronics, and other equipment and devices critical to U.S. commerce. Natland Decl. ¶2, Ex. A, Ex. B. Manufacturing more than 2 billion products annually, Broadcom designs and manufactures products that provide key functionality for numerous technologies, including mobile phones and smart phones such as the Apple iPhone, audio and video devices, televisions, home cable boxes, Ethernet solutions, and network communication equipment such as the national cellular network. Natland Decl. ¶3. Broadcom's clients include Apple, Cisco, Dell, DirecTV, Samsung, and many others. Natland Decl. ¶4. Broadcom has won many accolades over the years, including being listed as a Gartner top 10 semiconductor company based on sales revenue. Natland Decl. ¶5.

Broadcom is a leader in the semiconductor and technology industries and owns numerous federal trademark registrations for its BROADCOM mark, which it has used continuously for over two decades. Natland Decl. ¶3. Broadcom also owns federal trademark registrations for numerous other BROAD-containing marks, including the marks BROADRANGE and BROADVOICE. Broadcom's pleaded registrations made of record pursuant to Trademark Rule of Practice 2.122(d) cover a wide range of computer hardware and software, semiconductor, computer, communications and technology-related goods and services in Classes 9 and 42.

Broadcom's registrations of record include the following, all of which are incontestable.

See Notice of Opposition (TTABVue Dkt. # 1) at Exhibit A.

MARK	APP NO./ FILING DATE	REG. NO./ REG. DATE	CLASS: GOODS / SERVICES
BROADCOM	74/513,786 18-Apr-1994	2132930 27-Jan-1998	9: Computer hardware and software for digitally operating upon signals in a network system to recover the information represented by such signals and for recovering and decoding video and audio information from signals transmitted by a direct broadcast satellite
BROADCOM	75/666,750 23-Mar-1999	2392925 10-Oct-2000	9: Computer hardware; integrated circuits; and software for controlling and using integrated circuits
	75/667440 23-Mar-1999	2326387 07-Mar-2000	9: Computer hardware; integrated circuits; and software for controlling and using integrated circuits
BROADCOM	75/909,168 04-Feb-2000	2595174 16-Jul-2002	42: Design of computer hardware, integrated circuits, communications hardware and software, and computer networks for others
	75/909,166 04-Feb-2000	2625799 24-Sept-2002	42: Design of computer hardware, integrated circuits, communications hardware and software, and computer networks for others
BROADVOICE	76/300156 14-Aug-2001	2913502 21-Dec-2004	9: computer hardware; integrated circuits; and software for controlling and using integrated circuits
BROADRANGE	78/948,853 09-Aug-2006	3490624 19-Aug-2008	9: Computer hardware; integrated circuits; computer chipsets; integrated circuit chipsets; computer hardware, integrated circuits, computer chipsets, and integrated circuit chipsets for communication, wireless communication and connectivity; firmware for using and controlling wireless broadband communication technology and to enable communication and wireless communication; computer software for communication, wireless communication, and connectivity, and for controlling and using integrated circuits; computer software embedded or contained in computer hardware for communication, wireless communication, and connectivity, and for controlling and using integrated circuits

(collectively, "Broadcom's Marks" or "Broadcom's Registrations").

B. Broadchip and its trademark application for the BROADCHIP mark

Broadchip is a Chinese corporation that sells semiconductors. Natland Decl. ¶9, Ex. C. According to Broadchip’s employees, Broadchip sells semiconductor chips for use in counterfeit mobile phones. Natland Decl. ¶11.

The “main applications” for Broadchip’s devices include “portable device [sic] like cell phone [sic], MP3/4 Players, PDA, digital camera, the computer, HDTV, LCD display, automobile electron [sic] and so on . . .” and its products target the “industrial, computer, communication, and consumer markets.” Natland Decl. ¶9, Ex. C. Broadchip has historically focused on Asian markets for its semiconductor chips, but now is seeking to expand its chip sales into the U.S. market. Natland Decl. ¶¶9, 10, Ex. C.

Broadchip’s BROADCHIP application as shown below was filed in connection with goods and services that are identical to and/or related to the goods and services for which Broadcom has become well-known.

MARK	APP NO. FILING DATE	CLASS: GOODS / SERVICES
BROADCHIP	77/855,572 22-Oct-2009	9: Handheld and mobile digital electronic devices in the nature of mobile data terminals and secure terminals for electronic transactions, namely, telecommunication terminal for the sending and receiving of telephone calls, faxes, electronic mail, and other digital data; MP3 and digital audio players; handheld computers, personal digital assistants, electronic personal organizers, handheld computers in the nature of electronic notepads; telephones, mobile cellular telephones; computer game consoles for use with an external display screen or monitor, videophones, cameras; software for the redirection of messages, Internet e-mail, and other data to one or more electronic handheld devices from a data store on or associated with a personal computer or a server; software for the synchronization of data between a remote station or device and a fixed or remote station or device; computer hardware and software for providing integrated telephone communication with computerized global information networks; semiconductors; computer chipsets for use in transmitting data to and from a central processing unit; semiconductors and computer chipsets used in transmitting data to and from a central processing unit for

		<p>communication, wireless communication, industry control and connectivity; computer software for communication, wireless communication, industry control and connectivity, namely, communication software for providing access to the Internet, communications software for connecting computer network users and global computer networks, computer software for communicating with users of hand-held computers, computer software for wireless content delivery, computer software for controlling and managing access server applications, industrial process control software, computer firmware for using and controlling wireless broadband communication technology and to enable wireless communication, communication over the internet, and communication by connecting computer network users and global computer networks</p> <p>42: Design and development of computer hardware and software; design and development of telecommunication-related computer hardware and software; design and development of semiconductor-related computer hardware and software; computer hardware and software consulting services for others; consulting in the field of telecommunications technology, namely, telecommunication hardware and software consulting services for others; multimedia and audio-visual computer software consulting services for others; computer programming; development of voluntary standards for developing telecommunication systems, wireless systems, industry control systems, semiconductors, computer systems, databases and applications; consulting in the fields of telecommunications technology and information technology, namely, technical consultation services for developing telecommunication systems, wireless systems, industry control systems, semiconductors, computer systems, databases and applications; technical information relating to computer hardware and software provided on-line from a global computer network, telecommunication network and the Internet; creation and maintenance of web-sites for others; providing search engines for obtaining data on a global computer network; computer services, namely, creating indexes of service information, websites and other resources available on global computer networks for others; hosting of digital content on the Internet, namely, hosting of digital content composed of technical information provided over a global computer network</p>
--	--	---

Broadchip has admitted that it *cut and pasted from Broadcom's Registrations* to describe the goods and services in the BROADCHIP application. Natland Decl. ¶18, Ex. G (the "RFAs") at RFA #129.

Broadcom's registrations for its BROADCOM mark in U.S. Registration Nos. 3787260, 3789931, and 3787268 include:

Semiconductors; computer chipsets; semiconductors, computer chipsets and computer software for communication, wireless communication and connectivity; firmware for using and controlling wireless broadband communication technology and to enable communication and wireless communication, in Class 9; Design of computer hardware....and software, in Class 42.

Broadchip's BROADCHIP application includes:

[S]emiconductors; computer chipsets for use in transmitting data to and from a central processing unit; semiconductors and computer chipsets used in transmitting data to and from a central processing unit for communication, wireless communication, industry control and connectivity... ; computer software for communication, wireless communication, industry control and connectivity . . . computer firmware for using and controlling wireless broadband communication technology and to enable wireless communication. . . in Class 9; Design and development of computer hardware and software; design and development of telecommunication-related computer hardware and software; design and development of semiconductor-related computer hardware and software..., in Class 42.

Moreover, Broadchip has used a tag line, "Connecting the Real World," which is virtually identical to Broadcom's prior long-standing CONNECTING EVERYTHING tag line. Natland Decl. ¶12, Ex. D. Broadcom's CONNECTING EVERYTHING tag line is used on Broadcom's marketing materials, press releases and elsewhere and protected under Trademark Registration No. 3,787,269. Natland Decl. ¶13, Ex. E.

Additionally, Broadcom's products are well-known and easily identifiable in the industry via Broadcom's naming convention, which uses the letters "BCM" followed by a four-or-five digit numbering sequence to identify its different chip models. For example, the "BCM4329" chip has been used to give the Apple iPhone its wireless, GPS and Bluetooth functionality. Natland Decl. ¶16, Ex. F. Broadchip has also copied Broadcom's naming convention, only switching "BCM" to

“BCT” – as in the “BCT43141” model advertised on Broadchip’s website. Natland Decl. ¶16, Ex. C.

Finally, the Chinese Trademark Office (“CTMO”) agrees that the BROADCHIP mark is likely to be confused with Broadcom’s BROADCOM mark. In November 2012, following an opposition filed by Broadcom, the CTMO issued a decision refusing registration of Broadchip’s trademark application in China for the B BROADCHIP (and design) mark in connection with the following goods in Class 9: semiconductor device; electronic chips; amplifiers; integrated circuits; chips (integrated circuits); and printed circuits. Natland Decl. ¶17.

Despite the CTMO’s decision, Broadchip re-filed the identical mark for the identical goods that were already refused by the CTMO. Natland Decl. ¶17. Broadcom was forced to once again oppose Broadchip’s second application in China, this time based on both a likelihood of confusion with Broadcom’s prior rights and Broadchip’s bad faith in filing the second application. Natland Decl. ¶17. This second opposition is currently pending with the CTMO. Natland Decl. ¶17.

C. The subject opposition proceeding

Broadcom instituted this opposition proceeding on February 18, 2011 on the ground that the BROADCHIP application is likely to cause confusion with Broadcom’s well-known BROADCOM mark and other BROAD-containing marks in violation of Section 2(d) of the Lanham Act. Notice of Opposition ¶15. Broadchip, represented by U.S. counsel at the time, filed its Answer to the Notice of Opposition on March 30, 2011. TTABVUE Dkt. # 4.

1. Broadchip failed to respond to Broadcom’s discovery requests

Under the Board’s initial scheduling order, discovery opened on April 29, 2011. TTABVUE Dkt.#2. On September 2, 2011 Broadcom served written discovery, including

requests for admissions, document requests, and interrogatories. Broadcom also served deposition notices of individuals and of Broadchip.

Despite multiple reminders and follow up efforts by Broadcom, Broadchip failed to serve any responses to Broadcom's discovery requests, including Broadcom's First Set of Requests for Admission ("Requests for Admissions"), and refused to produce witnesses for deposition, or even provide suitable alternative dates for the depositions. On November 23, 2011, following several unresponsive attempts to meet and confer with Broadchip, Broadcom moved to compel responses to its interrogatories and requests for production of documents, as well as to compel Broadchip and its employees to appear for a deposition. TTABVUE Dkt. #9. Broadcom also noted that due to Broadchip's failure to serve timely responses to Broadcom's Requests for Admissions, they are deemed admitted by operation of law. Motion to Compel at p. 2, n.1; *see also* TTABVUE Dkt. # 9 at p. 2, n.1. Broadchip did not oppose the Motion to Compel, and in the Board's Order of August 9, 2013, the Board granted the Motion to Compel as conceded.

**2. Broadcom's Motion for Sanctions and the Board's Order Granting
Broadcom's Motion for Sanctions**

Despite the Board's August 9, 2013 Order on the Motion to Compel, Broadchip still failed to provide adequate responses to Broadcom's discovery requests and failed to produce witnesses for deposition, which prompted Broadcom to file a Motion for Entry of Sanctions on September 12, 2013 ("Motion for Sanctions"). TTABVUE Dkt.#14. Broadchip did not oppose the Motion for Sanctions and continued to blatantly ignore its obligations to respond to Broadcom's discovery requests. On June 2, 2016, the Board issued its Order granting Broadcom's Motion for Sanctions and also acknowledged that pursuant to Federal Rule of Civil Procedure 36(a)(3), Broadcom's Requests for Admissions are deemed admitted by operation of law for Broadchip's failure to serve

timely responses. TTABVUE Dkt. #18, p.3, n.2.

III. ARGUMENT

A. Standard for Summary Judgment

A motion for summary judgment is an appropriate method for disposing of an *inter partes* proceeding when “there is no genuine issue as to any material fact [such] that the movant is entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a); *see also* 37 C.F.R. § 2.116(a) (Federal Rules of Civil Procedure generally apply to *inter partes* proceedings). Summary judgment “is regarded as ‘a salutary method of disposition,’ and the Board does not hesitate to dispose of cases on summary judgment when appropriate.” TBMP § 528.01 (citations omitted).

Likelihood of confusion is “a legal conclusion based on underlying facts.” *Cunningham v. Laser Golf Corp.*, 55 U.S.P.Q.2d 1842, 1843-44 (Fed. Cir. 2000). As such, it is an issue that “the [B]oard may unquestionably resolve ... on summary judgment.” *Sweats Fashions Inc. v. Pannill Knitting Co.*, 4 U.S.P.Q.2d 1793, 1797 (Fed. Cir. 1987); *see also Hewlett-Packard Dev. Co. v. Vudu, Inc.*, 92 U.S.P.Q.2d 1630, 1632-33 (T.T.A.B. 2009) (granting summary judgment on the issue of likelihood of confusion).

B. Broadcom’s Requests for Admissions are conclusively admitted and established

Federal Rule of Civil Procedure 36(a)(3) provides that requests for admissions are deemed admitted *as a matter of law* if the receiving party fails to respond in writing within the required time period. Fed. R. Civ. P. 36(a)(3). As set forth in the Board’s June 2, 2016 Order, all of Broadcom’s Requests for Admissions are admitted pursuant to this rule. TTABVUE Dkt. #18, p.3, n.2.

C. The BROADCHIP application should be refused pursuant to Section 2(d) of the Lanham Act

There is no genuine dispute of material fact that: (1) Broadcom has standing to oppose the BROADCHIP application; (2) Broadcom has priority of use; and (3) Broadchip's use of the mark BROADCHIP in Application Serial No. 77/855,572 is likely to cause confusion among consumers as to the sponsorship, affiliation or connection of goods and services offered under the parties' respective marks. *See, e.g., Lipton Indus., Inc. v. Ralston Purina Co.*, 213 U.S.P.Q. 185, 187 (C.C.P.A. 1982); *Hornblower & Weeks, Inc. v. Hornblower & Weeks, Inc.*, 60 U.S.P.Q.2d 1733, 1735 (T.T.A.B. 2001).

As a consequence, Broadcom is entitled to judgment as a matter of law.

1. Broadcom has standing

Broadcom has properly plead its prior registrations of record, providing proof of standing and the damage suffered by Broadcom from the registration of the BROADCHIP mark. *See Research in Motion Ltd. v. Defining Presence Mktg. Group Inc.*, 102 USPQ2d 1187, 1190 (T.T.A.B. 2012) (pleaded registrations of record established standing).

Under the Lanham Act, "any person who believes that he is or will be damaged . . . by the registration of a mark" may file an opposition. 15 U.S.C. § 1063(a). This threshold standing requirement is satisfied where the opposer possesses a "real interest" in the proceeding. *Compuclean Mktg. & Design v. Berkshire Prods. Inc.*, 1 U.S.P.Q.2d 1323, 1324 (T.T.A.B. 1986) (citing cases). As the record owner of Broadcom's Registrations, Broadcom has a "real interest" in challenging the registration of the BROADCHIP mark.

Moreover, Broadchip has admitted that the use and registration of the BROADCHIP mark damages Broadcom's Marks (RFA #51) and that it does not contest Broadcom's ownership of

Broadcom's Marks. RFA ##25-29, 31-37, 39-40. Accordingly, there is no genuine dispute that Broadcom has standing.

2. Broadcom has priority

Priority is established by a showing of proprietary rights in mark(s) arising from "a prior registration, prior trademark or service mark use, prior use as a trade name, prior use analogous to trademark or service mark use, or any other use sufficient to establish proprietary rights." *Herbko Int'l, Inc. v. Kappa Books, Inc.*, 64 U.S.P.Q.2d 1375, 1378 (Fed. Cir. 2002); TBMP § 309.03(c)(A).

Broadchip has admitted that:

- Broadcom's use of one or more of Broadcom's Marks predates Broadchip's use of the BROADCHIP mark. RFA #48.
- Broadcom's use of one or more of Broadcom's Marks predates Broadchip's filing of the BROADCHIP application. RFA #49.
- Broadcom is the senior user of Broadcom's Marks as against Broadchip's use of the BROADCHIP mark. RFA #50.

Furthermore, Broadcom owns the registrations of record. Each of these registrations were filed, issued and claim a date of first use before the October 22, 2009 filing date of the BROADCHIP application. This establishes Broadcom's priority. *See, e.g., Herbko*, 64 U.S.P.Q.2d at 1378; *King Candy Co. v. Eunice King's Kitchen, Inc.*, 182 U.S.P.Q. 108, 110 (C.C.P.A. 1974); TBMP § 309.03(c)(A).

In light of the facts above, no genuine dispute exists regarding Broadcom's priority of rights.

3. The BROADCHIP mark is likely to cause confusion with Broadcom's Marks

Section 2(d) of the Lanham Act states in pertinent part that a trademark shall be refused registration if it so resembles a prior used or registered mark “as to be likely, when used on or in connection with the goods of the applicant, to cause confusion, or to cause mistake, or to deceive.” 15 U.S.C. § 1052(d). In determining likelihood of confusion, the Board reviews the factors set forth in *In re E. I. du Pont de Nemours & Co.*, 177 U.S.P.Q. 563,567 (C.C.P.A. 1973) (“*du Pont*”), to the extent relevant. See also *Recot, Inc. v. Becton*, 54 U.S.P.Q.2d 1894, 1896-97 (Fed. Cir. 2000).

Here, the most relevant factors are: (i) the strength and fame of Broadcom’s Marks; (ii) the similarity between the BROADCHIP mark and Broadcom’s Marks in appearance, sound, and commercial impression; (iii) the overlap and relatedness of the parties’ respective goods and services; (iv) the overlap of the parties’ trade channels, customers and industries; (v) Broadchip’s intent; and (vi) the extent of any actual confusion.

Broadchip has admitted that there is a likelihood of confusion between its BROADCHIP mark for the goods and services covered under Application Serial No. 77/855,572 and Broadcom’s Marks for the goods and services covered under Broadcom’s Registrations. RFA #43. This alone establishes the necessary showing under Section 2(d), sufficient to entitle Broadcom to summary judgment.

Moreover, Broadchip has separately admitted facts sufficient to show that the relevant *du Pont* factors evidence a likelihood of confusion. Accordingly, Broadcom is entitled to summary judgment on its Section 2(d) claim.

a. Broadcom's Marks are strong and famous

An important *du Pont* factor is the strength and fame of the senior mark. *See Kenner Parker Toys, Inc. v. Rose Art Indus., Inc.*, 22 U.S.P.Q.2d 1453, 1456 (Fed. Cir. 1992) (a famous mark “casts a long shadow which competitors must avoid”).

Broadchip has admitted that:

- Broadcom's Marks are well-recognized. RFA #133.
- Broadcom's Marks are famous. RFA #134.
- Broadcom's Marks are strong. RFA #135.
- Broadchip was aware of Broadcom, Broadcom's Marks and Broadcom's Registrations before adopting or filing for the BROADCHIP mark in the U.S. RFA ##138, 140, 141.
- Broadchip selected and commenced use of the BROADCHIP mark with the intent to benefit from the goodwill and reputation developed by Broadcom in one or more of Broadcom's Marks. RFA # 41.
- Broadchip filed its application for the BROADCHIP mark with the intent to benefit from the goodwill and reputation developed by Broadcom in one or more of Broadcom's Marks. RFA #42.

Therefore, this *du Pont* factor weighs conclusively in favor of Broadcom.

**b. The BROADCHIP mark is similar to Broadcom's
BROADCOM and BROAD-containing marks in appearance,
sound and commercial impression**

Another key *du Pont* factor focuses on the similarity of the marks in their entirety as to appearance, sound, and commercial impression. *du Pont*, 177 U.S.P.Q. at 567. The evidence

supported by Broadchip's own admissions shows that the BROADCHIP mark is similar to one or more of Broadcom's Marks.

Broadchip has admitted that:

- The BROADCHIP mark is similar to one or more of Broadcom's Marks.
RFA #172.
- The BROADCHIP mark is similar in appearance to Broadcom's Marks.
RFA #173.
- The BROADCHIP mark is similar in sound to Broadcom's Marks. RFA #174.
- The BROADCHIP mark is similar in commercial impression to
Broadcom's Marks. RFA #175.

Broadchip has also admitted that the term "BROAD" is fully encompassed by Broadcom's Marks and the word "CHIP" is the generic name for at least one of both parties' products. RFA ##170, 171. Indeed, "chipsets" are covered under both parties' trademark filings.

Accordingly, this *du Pont* factor weighs conclusively in favor of Broadcom.

c. **Broadchip's goods and services are identical and related to
Broadcom's goods and services**

Another key *du Pont* factor is the similarity and relatedness of the parties' products offered under their respective marks. *du Pont*, 177 U.S.P.Q. at 567. The goods and services at issue need not be identical for confusion to be likely; there need only be some similarity or relatedness between them. *In re Melville Corp.*, 18 U.S.P.Q.2d 1386, 1388 (T.T.A.B. 1991); *Recot, Inc.*, 54 u. S.P.Q.2d. at 1898 ("It is the sense of relatedness that

matters in the likelihood of confusion analysis.”).

Broadchip has admitted that:

- One or more of the goods covered under the BROADCHIP application are identical to the goods covered under Broadcom’s Registrations. RFA #128.
- Broadchip copied the claim of goods in the BROADCHIP application from the claim of goods in one or more of Broadcom’s trademark applications or registrations. RFA #129.

Furthermore, there is direct overlap between the goods and services in the BROADCHIP application and the goods and services in Broadcom’s Registrations in both Classes 9 and 42. These include the following identical or nearly identical goods and services in the BROADCHIP application to those in Broadcom’s Registrations:

Computer chipsets; computer firmware for using and controlling wireless broadband communication technology and to enable wireless communication . . . ; computer software for communication, wireless communication, . . . and connectivity . . . , in Class 9; Design and development of computer hardware and software; design and development of telecommunication-related computer hardware and software; design and development of semiconductor-related computer hardware and software, in Class 42.

Additionally, the Board has held that computer-related (and other) goods in Class 9 and computer-related (and other) services in Class 42 are considered similar to one another, and that potential customers may mistakenly believe that such goods and services are authorized, sponsored or licensed by the same company. *See In re Iolo Technologies, LLC*, 95 U.S.P.Q. 2d 1498 (T.T.A.B. 2010) (precedential) (finding that software products in Class 9 and software services in Class 42 that are complementary in function and purpose are likely to be perceived by consumers as deriving from the same source); *see also X/Open Company Limited v. Chong*

Teck Choy, Cancellation No. 92057631 at 13-15 (T.T.A.B. May 10, 2016) (non-precedential) (finding that a Class 9 registration for “computers” and “computer software” is related to Class 42 “computer-related services” which included computer programming and software design, creating computer programs, customization of computer hardware and software, and technical consulting and support services, among many more); *see also In re Avamar Technologies, Inc.*, Serial No. 78/153,324 at pp. 7-8 (T.T.A.B. September 29, 2005) (non-precedential) (finding “computer software and hardware for secure storage of data and network software” in Class 9 and services involving computer software and hardware installation, design and support services in Class 42 to be related). In the instant case, the parties’ respective goods and services are either directly overlapping, complementary or related to one another.

Accordingly, the *du Pont* factor concerning similarity of the parties’ respective goods weighs conclusively in Broadcom’s favor.

d. The parties’ trade channels and customers overlap

Another *du Pont* factor is the overlap of the parties’ trade channels and customers.

Broadchip has admitted that:

- The goods and services covered under the BROADCHIP application travel through the same trade channels as the goods and services covered under Broadcom’s Registrations. RFA #54.
- The goods covered under the BROADCHIP application are or will be sold in the same channels of trade as the goods covered under Broadcom’s Registrations. RFA #130.
- The goods covered under the BROADCHIP application are or will be sold to the same customers as the goods covered under Broadcom’s Registrations. RFA

#131.

- There is consumer overlap between purchasers of Broadchip's products and purchasers of Broadcom's products. RFA #139.
- The BROADCHIP mark and Broadcom's Marks are or will be encountered by the same consumers. RFA #176.
- The BROADCHIP mark and Broadcom's Marks are used in the same industry. RFA #178.
- The BROADCHIP mark and Broadcom's Marks are both used in the semiconductor industry. RFA # 177.

Accordingly, the *du Pont* factor concerning the overlap of trade channels weighs conclusively in favor of Broadcom.

e. **The types of purchasers of the goods and services covered under Broadcom's Registrations and the BROADCHIP application could be confused**

Another *du Pont* factor considers "the conditions under which and buyers to whom sales are made, *i.e.*, 'impulse' vs. careful, sophisticated purchasing." *du Pont*, 177 U.S.P.Q. at 567.

Even if Broadchip were to argue that consumers of the respective parties' goods and services are sophisticated, the Federal Circuit and its predecessor court have clearly stated that even sophisticated customers are not immune from source confusion. *See In re Research & Trading Corp.*, 230 USPQ 49, 50 (Fed. Cir. 1986) ("That the relevant class of buyers may exercise care does not necessarily impose on that class the responsibility of distinguishing between similar trademarks for similar goods.") citing *Carlisle Chem. Works, Inc. v. Hardman & Holden Ltd.*, 168 USPQ 110, 112 (C.C.P.A. 1970) ("Human memories even of discriminating purchasers ... are not

infallible.”). “Although many of the parties’ customers are sophisticated..., these customers’ technical sophistication about their particular industry does not equate to trademark sophistication.” *See CAE*, 60 USPQ2d at 1464-65.

Thus, even if Broadchip argues that the relevant consumers are sophisticated, that does not trump the similarity of the marks, the similarity of the goods and services, the overlap in trade channels and customers, as well as the actual confusion and other factors that support a likelihood of confusion.

Indeed, in this case, Broadchip has admitted that there has been actual confusion in the marketplace between the BROADCHIP mark and Broadcom’s Marks. RFA #52.

f. Broadchip intended to ride off the goodwill of Broadcom

Broadchip was well-aware of Broadcom and Broadcom’s Marks when it adopted and filed for the BROADCHIP mark. Moreover, Broadchip adopted the BROADCHIP mark with the intent of benefiting from the goodwill and reputation of Broadcom’s Marks and Broadcom’s business. Indeed, Broadchip has demonstrated a pattern of trying to copy and benefit from the goodwill and reputation of Broadcom and its marks.

Broadchip has admitted that:

- Prior to selecting the BROADCHIP mark, it was aware of Broadcom’s Marks and Broadcom’s use of the BROADCOM mark. RFA ##138, 140.
- Broadchip selected and commenced use of the BROADCHIP mark and filed the BROADCHIP application with the intent to benefit from the goodwill and reputation developed by Broadcom in one or more of Broadcom’s Marks. RFA ##41, 42.
- Broadchip copied the goods covered under the BROADCHIP application from

Broadcom's claim of goods in one or more of Broadcom's Marks. RFA #129.

In addition to adopting the confusingly similar BROADCHIP mark, Broadchip has adopted a tagline and product naming convention that are also confusingly similar to Broadcom's well-known tagline and product naming convention.

Broadchip has admitted to adopting the tagline "CONNECTING THE REAL WORLD," which it uses in connection with its goods and services. RFA #123. This tagline is similar to Broadcom's well-known CONNECTING EVERYTHING tagline, which Broadcom previously used in connection with virtually all of Broadcom's goods and services for over a decade. Natland Decl. ¶14. Broadcom also owns U.S. Registration Nos. 3787269, 2984436, and 2601945 for its CONNECTING EVERYTHING mark. Natland Decl. ¶14, Ex. E. Broadchip's "CONNECTING THE REAL WORLD" tagline starts with the same word "CONNECTING" and shares a very similar meaning and commercial impression to Broadcom's CONNECTING EVERYTHING tagline. Broadchip has additionally admitted that it was aware of Broadcom's use of the CONNECTING EVERYTHING tagline. RFA #124.

Broadchip has also admitted that it uses the three-letter naming convention "BCT" for its product naming. RFA #126. As shown on Broadchip's website, www.broadchip.com, the three letter naming convention "BCT" precedes the model numbers for Broadchip's goods (*e.g.*, BCT3141, BCT6901, BCT3662, BCT2232). Natland Decl. ¶14, Ex. C. Broadchip's "BCT" product naming convention is strikingly similar to Broadcom's three-letter naming convention for its products, "BCM" (*e.g.*, BCM3040, BCM6358, BCM3322, *etc.*), which was adopted long before Broadchip adopted the "BCT" naming convention. Natland Decl. ¶20, Ex. F.

Broadchip's activities before the CTMO further support a pattern of bad faith. Broadcom previously opposed Broadchip's application in China for the B BROADCHIP (and design) mark.

Natland Decl. ¶17. As a result, based on a likelihood of confusion with Broadcom's prior rights, the CTMO refused registration of Broadchip's trademark application for the mark B BROADCHIP (and design) for the following goods: semiconductor device; electronic chips; amplifiers; integrated circuits; chips (integrated circuits); printed circuits. Natland Decl. ¶17. Despite the CTMO's ruling, Broadchip re-filed an identical application in China for the identical mark covering the identical list of goods that the CTMO found confusingly similar to Broadcom's prior rights. Natland Decl. ¶17. Broadchip's actions before the CTMO constitute bad faith in China, and Broadcom has since opposed this second application in China. Natland Decl. ¶17.

The evidence and admissions by Broadchip strongly suggest Broadchip's intent (i) to benefit from the goodwill and strong reputation developed by Broadcom in Broadcom's Marks, and (ii) to create a likelihood of consumer confusion.

Broadchip's ill intent and pattern of bad faith further support the likelihood of consumer confusion between the BROADCHIP mark and Broadcom's Marks.

g. There has been actual marketplace confusion between the BROADCHIP mark and Broadcom's Marks

Another consideration in the *du Pont* analysis is whether there is any actual marketplace confusion. It is well-established that "it is unnecessary to show actual confusion in establishing a likelihood of confusion." *Giant Food, Inc. v. Nation's Foodservice, Inc.*, 218 U.S.P.Q. 390, 396 (Fed. Cir. 1983). However, the Federal Circuit has said that "a showing of actual confusion would of course be highly probative, if not conclusive, of a high likelihood of confusion." *In re Majestic Distilling Co.*, 65 U.S.P.Q. 2d. 1201, 1205 (Fed. Cir. 2003).

Here, Broadchip has admitted that there has been actual confusion in the marketplace between the BROADCHIP mark and Broadcom's Marks. RFA #52.

As such, this highly probative *du Pont* factor weighs conclusively in favor of Broadcom.

IV. CONCLUSION

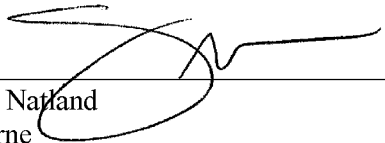
For the foregoing reasons, the undisputed facts and admissions establish a likelihood of confusion, mistake and deception arising from registration of the BROADCHIP mark and, thus, Broadcom is entitled to summary judgment on its Section 2(d) claim.

Accordingly, Broadcom respectfully requests that the BROADCHIP application be refused registration and abandoned, and that judgment for Broadcom be entered in this proceeding.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: June 24, 2016

By:  _____

Susan M. Natland
Brian Horne
Charlene Azema
2040 Main Street, 14th Floor
Irvine, CA 92614
(949) 760-0404
Attorneys for Opposer, Broadcom Corporation

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **OPPOSER'S MOTION FOR SUMMARY JUDGMENT** upon Applicant by depositing one copy thereof in the United States Mail, first-class postage prepaid, on June 24, 2016 addressed as follows:

Kathy Geng
Secretary
Broadchip Technology Group Ltd.
1008 Strayer Drive
San Jose, CA 95129

A handwritten signature in black ink, appearing to read 'Pamela Pascual', is written over a horizontal line.

Pamela Pascual
Trademark Paralegal

23621605
062416

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Broadcom Corporation,

Opposer,

v.

Broadchip Technology Group Ltd.,

Applicant.

Opposition No.: 91198660

Subject Mark: BROADCHIP

Application No.: 77/855,572

DECLARATION OF SUSAN M. NATLAND IN SUPPORT OF OPPOSER'S MOTION FOR
SUMMARY JUDGMENT

I, Susan M. Natland, declare as follows:

1. I am Partner in the law firm of Knobbe, Martens, Olson & Bear, LLP, counsel of record for Opposer, Broadcom Corporation, ("Broadcom") in the above-captioned action. I am licensed to practice law in the State of California. I have personal knowledge of the following facts, and would competently testify as to their truth if called upon to do so.

2. Broadcom is a semiconductor design and development company that has been operating for over twenty-five years and employs several thousand individuals around the world, more than half of whom are located in the United States. Attached hereto as Exhibit A are true and correct copies of Broadcom's Facts at a Glance sheet describing the overall nature of Broadcom's business.

3. Broadcom's semiconductors and computer chipsets power Internet and wireless communication devices, global positioning equipment, digital televisions, consumer electronics, and other equipment and devices critical to U.S. commerce. Broadcom has continuously used the BROADCOM mark for over two decades.

4. Manufacturing more than 2 billion products annually, Broadcom designs and manufactures products that provide key functionality for numerous technologies, including mobile phones and smart phones such as the Apple iPhone, audio and video devices, televisions, home cable boxes, Ethernet solutions, and network communication equipment such as the national cellular network.

5. Broadcom's clients include Apple, Cisco, Dell, DirecTV, Samsung, and many others.

6. Broadcom has won many accolades over the years, including being listed as a Gartner top 10 semiconductor company based on sales revenue.

7. Broadcom is a leader in the semiconductor and technology industries and owns numerous federal trademark registrations for its BROADCOM mark, which it has used continuously for over two decades.

8. Attached hereto as Exhibit B are true and correct copies of printouts from Broadcom's website located at www.broadcom.com which (1) describes the overall nature of Broadcom's products, and (2) shows use of "BCM" followed by a four or digit numbering sequence adopted as a naming convention by Broadcom.

9. Broadchip is a Chinese corporation that sells semiconductors. Attached hereto as Exhibit C are true and correct printouts of pages from Broadchip's English version website located at www.broadchip.com/en/ indicating that (1) Broadchip is a semiconductor company, (2) Broadchip's "main applications will be portable device like cell phone, MP3/4 Players, PDA, digital camera, the computer, HDTV, LCD display, automobile electron and so on", (3) Broadchip will focus on designing, developing and marketing integrated circuit products targeting "industrial, computer, communication, and consumer markets," and (4) showing Broadchip's use of "BCT" followed by a four digit numbering sequence adopted as a naming convention by Broadchip.

10. On January 14, 2011, I had a telephone conversation with Broadchip's prior attorney, Jay Landrum, in which Mr. Landrum advised me that Broadchip was seeking to expand its chip sales in the U.S. Market.

11. On March 17, 2010, I obtained an investigation report from a firm in China stating that one of Broadchip's employees in China advised that Broadchip's "clients are cell phone design companies, including companies designing counterfeit cell phones."

12. Broadchip has used a tag line, "Connecting the Real World." Attached hereto as Exhibit D are true and correct copies of printouts of pages from Broadchip's English version website located at www.broadchip.com/en/ from July 28, 2014 showing Broadchip's use of the tagline "Connecting the Real World" on its website.

13. Broadcom owns U.S. Trademark Registration Nos. 2601945, 2984436 and 3787269 for the mark CONNECTING EVERYTHING. Attached hereto as Exhibit E are true and correct copies of USPTO online TARR printouts of Broadcom's registrations for CONNECTING EVERYTHING.

14. Broadcom's CONNECTING EVERYTHING tag line has been used for over a decade on virtually all of Broadcom's goods and services, and is used on Broadcom's marketing materials, press releases and elsewhere.

15. Additionally, Broadcom's products are well-known and easily identifiable in the industry via Broadcom's naming convention, which uses the letters "BCM" followed by a four-or-five digit numbering sequence to identify its different chip models.

16. "BCM4329" chip has been used to give the Apple iPhone its wireless, GPS and Bluetooth functionality. Attached hereto as Exhibit F are true and correct copies of the product brief for BCM4329 which describes the functionality of this chip.

17. In November 2012, following an opposition filed by Broadcom, the Chinese Trademark Office ("CTMO") issued a decision refusing registration of Broadchip's trademark application in

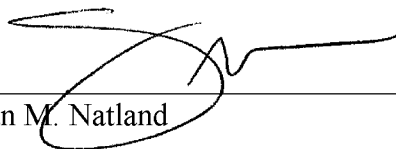
China for the B BROADCHIP (and design) mark in connection with the following goods in Class 9: semiconductor device; electronic chips; amplifiers; integrated circuits; chips (integrated circuits); and printed circuits. Broadchip re-filed the identical mark for the identical goods that were already refused by the CTMO. Broadcom opposed Broadchip's second application in China, based on both a likelihood of confusion with Broadcom's prior rights and Broadchip's bad faith in filing the second application. This second opposition is currently pending with the CTMO.

18. On September 2, 2011 Broadcom served written discovery, including requests for admissions, document requests, and interrogatories. Attached hereto as Exhibit G is a true and correct copy of Broadcom's First Set of Requests for Admission served on Broadchip.

19. As shown on Broadchip's website, www.broadchip.com (Ex. C), the three letter naming convention "BCT" precedes the model numbers for Broadchip's goods (e.g., BCT3141, BCT6901, BCT3662, BCT2232).

20. Broadchip's "BCT" product naming convention is strikingly similar to Broadcom's three-letter naming convention for its products, "BCM" (e.g., BCM3040, BCM6358, BCM3322, etc.), which was adopted long before Broadchip adopted the "BCT" naming convention.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on the 24 day of June, 2016 at Irvine, California



Susan M. Natland

EXHIBIT A

FACTS at a GLANCE

Broadcom is a global innovator and leader in semiconductor solutions for wired and wireless communications.

Founded: 1991

Stock Symbol: BRCM (NASDAQ)

President, CEO and Board Member: Scott A. McGregor

Co-Founder, Chairman of the Board and CTO: Henry Samueli

2014 Revenue: \$8.43 billion

Q3 2015 Revenue: \$2.19 billion

Top Honors:

Fortune 500®

Gartner Top 10 Semiconductor Company

Business Insider Top 25 Best Employers in America

IP Portfolio Strength:

Top 30 U.S. Patent Assignees, IFI Claims

#9 in Semiconductor Industry, IEEE

#2 Among Fabless Companies in Semiconductor Industry, IEEE

R&D Dollar Spending:

#2 in R&D Intensity, Fortune

~\$2.4 billion annual investment

Company

Founded in 1991, Broadcom's mission is simple: Connecting everything®. Today, the company estimates that 99.98% of Internet traffic crosses at least one Broadcom chip – in the home, in the hand and across the network.

A Fortune 500® company, Broadcom provides the industry's broadest portfolio of state-of-the-art system-on-a-chip (SoC) solutions. Its products are found everywhere on the planet, from corporate data centers and the cloud, to communities across the world's emerging geographies.

Cisco reports that by 2020, the number of connected devices is expected to reach 50 billion –or six devices for every person on earth. Broadcom's role is to connect people to everything and everyone that matters, by delivering seamless connectivity across their devices and offering speed, power efficiency and unmatched design quality.

From automotive to appliances, bandwidth to backhaul, GPS to GPON, processors to powerline, set-top box to small cells, wearables to Wi-Fi, Broadcom is Connecting everything®.

Broadcom is a company founded by engineers, managed by experienced industry leaders and powered by the talents of a diverse workforce. Employees focus on a single mandate: to engineer the impossible for customers.

As one of the world's largest fabless semiconductor companies, Broadcom designs and develops its products in labs and design centers around the world and then works with independent chip-making facilities to manufacture more than two billion chips annually.

Headquartered in Irvine, Calif., Broadcom has offices in most major cities around the world including research and development facilities in North America, Asia and EMEA.

Customers

The company's global customer roster includes elite technology brands.



Expertise

As an engineering-driven company focused on R&D, Broadcom maintains an industry reputation for superior engineering execution and market innovation.

Broadcom holds one of the industry's broadest portfolios of intellectual property addressing both the wired and wireless transmission of voice, video, data and multimedia. Broadcom

has more than 20,000 U.S. and foreign patents and applications.

Throughout the years, Broadcom products and business practices have won top industry awards and recognition, validating the company's longstanding position as a leader in the semiconductor industry.

Markets and Products

Broadcom products deliver sophisticated performance to the broadest reaches of the global communications industry. The company's design innovations span technologies found across the home, mobile environments and network infrastructure, transforming the economics of communications through integration, connectivity, low power and price/performance.

From broadband technology to cloud infrastructure to wireless and wearables to home networking, Broadcom solutions are raising consumer expectations and setting the industry bar for design and engineering. Broadcom's SoC technologies play a key role in Ethernet-enabled Internet everywhere, bringing

performance to hybrid data centers and enterprise networks, as well as fueling consumer electronics markets. Broadcom solutions also enable the digital home of the future, transforming separate PC and consumer electronics into a single, high performance networked home domain.

Broadcom's financial strength and exposure to high-growth markets enables it to reinvest in innovation. The company holds a leading position in dozens of product categories including cable modem and cable satellite, DSL, Ethernet switch, IP set-top box and Wi-Fi.

Acquisitions

Over the past two decades, Broadcom has acquired more than 50 companies, expanding its technology expertise, market presence and commitment to ongoing innovation. Broadcom leverages strategic acquisitions to expand its product offerings for advanced SoC solutions for the delivery of voice, video and data in residential broadband gateway; enterprise and storage networking; and wireless communications applications. Some of Broadcom's most recent acquisitions include:

October 2013: Renesas Electronics LTE Assets

A leading provider of best-in-class LTE solutions

April 2012: BroadLight, Inc.

A leading provider of networking and fiber access PON processors

February 2012: NetLogic Microsystems, Inc.

A leader in high performance intelligent semiconductor solutions

May 2011: SC Square Ltd.

A leading security software developer

April 2011: Provigent Ltd.

A leader in mixed signal semiconductors for microwave backhaul systems

December 2010: Gige Networks, Inc.

A developer of SoC solutions for home networking

November 2010: Beceem Communications, Inc.

A leading provider of fourth generation (4G) wireless platform solutions

November 2010: Percello Ltd.

A leading supplier of SoC solutions for femtocells

July 2010: Innovision Research & Technology PLC

A leading provider of near field communications

March 2010: Teknovus, Inc.

A leading provider of Ethernet passive optical network

December 2009: Dune Networks

A developer of switch fabric solutions for data center networking equipment

October 2008: AMD DTV Business

A leading provider of DTV solutions, interactive platforms and panel processors

February 2008: Sunext Design, Inc.

A leading provider of optical drive technologies

July 2007: Global Locate, Inc.

A leading provider of global positioning system products and software

May 2007: Octalica, Inc.

A developer of networking technologies based on MoCA

January 2007: LVL7 Systems

A leading developer of production-ready networking software

Global Citizenship

As a global company focused on innovation, Broadcom recognizes its unique role in making a positive impact on social, economic and environmental issues. The company is committed to a range of social responsibility initiatives designed to enhance the lives of employees, customers, shareholders and the surrounding communities. Broadcom adheres to sustainable principles and business practices across its operations and ensures company success through a focus on health, safety, work-life balance and employee development.

One of Broadcom's goals is to inspire and enable people of all ages to enter careers in science, technology, engineering and math (STEM), furthered through the creation of the Broadcom Foundation and partnerships with local schools, colleges, universities and non-profit organizations. Broadcom Foundation

also created the Broadcom MASTERS® program, a partnership with Society for Science & the Public, to host national and international science and engineering competitions for middle school students.

From charitable giving and educational endowments to volunteerism and participation, Broadcom supports technical education and community programs, while encouraging its employees to get involved in the communities where they live and work.

For more information on Broadcom, its history, people, customers, products and technological innovation, please visit Broadcom.com.

EXHIBIT B



PRODUCT PORTFOLIO

Product Portfolio

☐ More Info

Search product names, numbers, or categories

BROADBAND ACCESS + MODEMS

Broadband Carrier Access / Cable (Broadband)

ENTERPRISE + NETWORK PROCESSORS

Knowledge-Based Processors / Processors / Security / Voice Over IP (VoIP) / Enterprise Wi-Fi

WIRELESS INFRASTRUCTURE

Base Station + Small Cells / Microwave + Mobile Backhaul

WIRELESS CONNECTIVITY

Bluetooth / GPS / NFC / Wireless LAN / Wireless Charging / Internet Of Things / WiGig / WICED™

ETHERNET COMMUNICATION + SWITCHING

Ethernet Controllers / Physical Layer / Switching / Ethernet Adapters

SET-TOP BOX + MEDIA PROCESSORS

Cable (STB + Media Processors) / IPTV / Multimedia Processors / Satellite

PRODUCTS

DOWNLOADS

COMPANY

CONTACT US



[Legal](#) [Privacy Policy](#)

Contents ©2016 Broadcom Ltd. All rights reserved.



BROADBAND ACCESS + MODEMS

Product Portfolio ☐ Broadband Access + Modems

☐ More Info

All Products ☐










Search product names, numbers, or categories

RESULTS

153

☐ Page 1 of 8 ☐

<input type="checkbox"/>	Universal 1024-QAM Modulator	BCM3034
<input type="checkbox"/>	Universal DOCSIS® 2.0-Based Downstream Modulator	BCM3040
<input type="checkbox"/>	Dual Universal DOCSIS®/EuroDOCSIS™ 2.0 Burst Receiver	BCM3140
<input type="checkbox"/>	DOCSIS®/EuroDOCSIS™ 2.0-Based CMTS MAC	BCM3214
<input type="checkbox"/>	DOCSIS®/EuroDOCSIS™ 2.0-Based Cable Modem Termination System	BCM93214
<input type="checkbox"/>	QAMLink® DOCSIS®/EuroDOCSIS™ 2.0 Single-Chip Cable Modem	BCM3349
<input type="checkbox"/>	Octal Downstream DOCSIS®/EuroDOCSIS™ 3.0-Based CMTS MAC	BCM3215
<input type="checkbox"/>	Upstream DOCSIS®/EuroDOCSIS™ 3.0-Based CMTS MAC	BCM3216
<input type="checkbox"/>	12-Channel Universal DOCSIS®/EuroDOCSIS™ 3.0 Burst Receiver	BCM3142
<input type="checkbox"/>	Advanced Direct Conversion Cable Tuner	BCM3421
<input type="checkbox"/>	1-GHz Low-Power Digital Cable Silicon Tuner	BCM3422

	DOCSIS®/EuroDOCSIS™ 3.0 Cable Modem SoC	BCM3382
	QAMLink® DOCSIS®/EuroDOCSIS™ 2.0 Voice Cable Modem SoC	BCM3378
	QAMLink® DOCSIS®/EuroDOCSIS™ 2.0 Voice Cable Modem SoC with PCI Express® Interface	BCM3379
	DOCSIS®/EuroDOCSIS™ 3.0 Cable Gateway SoC	BCM3383
	Gigabit DOCSIS® Cable Gateway Device	BCM3384
	Gigabit DOCSIS Cable Gateway Device	BCM33843
	C-DOCSIS Coax Media Converter (CMC)	BCM3227
	C-DOCSIS Combined MAC/PHY	BCM3218
	Single-Chip ADSL2+ Integrated Access Device Solution	BCM6358





SET-TOP BOX + MEDIA PROCESSORS

Product Portfolio ☐ Broadband Access + Modems ☐ Set-Top Box + Media Processors

☐ More Info

All Products ☐












Search product names, numbers, or categories

RESULTS

151

☐ Page 1 of 8 ☐

<input type="checkbox"/>	Universal Satellite Receiver	BCM94201
<input type="checkbox"/>	High-Definition (HD) TV Decoder Reference Design Platform Featuring H.264 Video Compression	BCM97395
<input type="checkbox"/>	Low-Cost Satellite Set-top Box SoC	BCM7325
<input type="checkbox"/>	High-Definition PVR Satellite SoC	BCM7335
<input type="checkbox"/>	HD Satellite Set-top Box SoC with Integrated MoCA® 1.1	BCM7340
<input type="checkbox"/>	HD PVR Satellite SoC with Power Management and MoCA® for Home Networking	BCM7342
<input type="checkbox"/>	HD Satellite SoC with Power Management and MoCA® for Home Networking	BCM7344
<input type="checkbox"/>	HD Satellite SoC with Power Management and MoCA® for Home Networking	BCM7346
<input type="checkbox"/>	HD Satellite SoC with Ethernet MII and PHY Capabilities for Home Networking	BCM7354

	HD Satellite SoC with Ethernet MII and PHY Capabilities for Home Networking	BCM7356
	Fully Integrated 40 nm High-Definition Satellite Set-top Box SoC	BCM7358
	Full-Band Capture Multidemodulator SoC	BCM4528
	Full-Band Capture Satellite Channel Stacker Solution	BCM4550
	Standard-Definition Satellite System on a Chip	BCM7301
	SAT>IP SoC for Headless SAT>IP Applications	BCM4562
	Multichannel DVB-S2 Home Gateway SoC	BCM4548
	Universal Satellite Receiver	BCM4201
	High-Definition Video Graphics Subsystem	BCM7020
	AVC/MPEG-2/VC-1 HD non-PVR Digital Video for Cable, Satellite and IP Set-Top Boxes	BCM7402
	AVC/MPEG High-Definition Decoder for Blu-ray HD DVDs	BCM7411D







WIRELESS CONNECTIVITY








Product Portfolio ☐ Broadband Access + Modems ☐ Set-Top Box + Media Processors ☐ Wireless Connectivity

☐ More Info All Products ☐

RESULTS 295

☐ Page of 15 ☐

<input type="checkbox"/>	WiMesh Technology for V-band mesh and WiGig-compliant infrastructure equipment	BCM20130
<input type="checkbox"/>	WiMesh Technology for V-band mesh and WiGig-compliant infrastructure equipment	BCM20138
<input type="checkbox"/>	Wearables/Internet of Things Reference Platform	BCM923550_EVB
<input type="checkbox"/>	Wireless Charging Power Management Unit (PMU) Chip	BCM59350
<input type="checkbox"/>	802.11a/g AP/Router Reference Design	BCM94704
<input type="checkbox"/>	802.11b/g Transceiver with BroadRange® Technology	BCM4318E
<input type="checkbox"/>	802.11b/g Reference Design with BroadRange® Technology	BCM94318E
<input type="checkbox"/>	Low-Power 802.11b/g Transceiver	BCM4326
<input type="checkbox"/>	Intensi-fi® Single-Chip 802.11n Transceiver	BCM4322
<input type="checkbox"/>	Intensi-fi® 802.11n Full-Featured 10/100 Processor	BCM4704

	Dual-Band 802.11n PCI Express® Half MiniCard Reference Design	BCM94322HMC
	Dual-Band 802.11n PCI Express® MiniCard Reference Design	BCM94322MC
	Single-Band 802.11n Mini PCI Reference Design (2.4 GHz)	BCM94322MP2D
	Dual-Band 802.11n Mini PCI Reference Design	BCM94322MP
	802.11n AP/Router Reference Design	BCM94704NR
	Intensi-fi® Single-Chip 802.11n Enterprise Solution	BCM4342
	Intensi-fi® XLR Single-Chip 802.11n USB Solution	BCM4323
	Intensi-fi® XLR 802.11n Simultaneous Dual-Band (2.4/5 GHz) Router System on Chip	BCM4718
	Single-Chip 802.11n USB Reference Design	BCM94323U
	802.11n (2.4/5 GHz) Router Reference Design	BCM94717







ETHERNET COMMUNICATION + SWITCHING

Broadband Access + Modems ☐ Set-Top Box + Media Processors ☐ Wireless Connectivity ☐ Ethernet Communication + Switching ☒

☐ More Info

All Products ☐

Search product names, numbers, or categories

RESULTS

284

☐ Page of 15 ☐

<input type="checkbox"/>	Quad-Port Ethernet Server Adapter	BCM5719-4P
<input type="checkbox"/>	Dual-Port Ethernet Server Adapter	BCM5720-2P
<input type="checkbox"/>	Dual-Port 1GbE Network Interface Card	BCM5720 NIC for Dell
<input type="checkbox"/>	Quad-Port 1GbE Network Interface Card	BCM5719 NIC for Dell
<input type="checkbox"/>	Quad-Port 1GbE Rack Network Daughter Card	BCM5720 NDC for Dell
<input type="checkbox"/>	Quad-Port 1GbE Blade Mezzanine Adapter Card	BCM5719 Dell Adapter
<input type="checkbox"/>	HP Ethernet 1Gb 4-port 331T Adapter	HP331T
<input type="checkbox"/>	HP Ethernet 1Gb 2-port 332T Adapter	HP332T













	HP Ethernet 1Gb 4-port 331FLR Adapter	HP331FLR
	Quad Port 1GbE for Lenovo™	49Y7900
	Dual Port 1GbE (CIOv) for Lenovo™	44W4475
	Dual/Quad Port 1GbE (CFFh) for Lenovo™	44W4479
	Dual 1GbE for Lenovo™	90Y9370
	Quad Port 1GbE for Lenovo™	90Y9352
	8-GbE Port Switch with Integrated GbE Copper PHY	BCM5388
	Integrated 10/100BASE-T/TX 5/6-Port Managed Switch	BCM5325M
	Integrated 10/100BASE-T/TX Nine-Port Switch	BCM5328M
	12-Port Multilayer Gigabit Ethernet Switch	BCM5696
	12-Port Layer 2+ Gigabit Ethernet Switch	BCM5698
	Integrated 24 FE + 2-GbE Managed Switch	BCM5324M





EXHIBIT C



Product Information

Power Management


- BATTERY CHARGERS
- DC-DC

Home Appliance

- Curler/straighter


Amplifiers & Comparator

- CMOS Low Noise Amplifier
- CMOS Highspeed Amplifier




Recommended

GO




Solution

GO



Products

GO



Service

GO

2015-12-21	BCT3141, BROADCHIP Release 1A charge pump LED driver chip flash
2015-12-21	BCT6901, BROADCHIP Release 1.6A charge management controller chip
2014-10-16	BCT3662, BROADCHIP backlight LED driver series with the introduction of dual chip
2013-01-20	BCT2232, BROADCHIP launched a high drive, high-speed dual-speed rail-to-rail operational amplifier

[More](#)

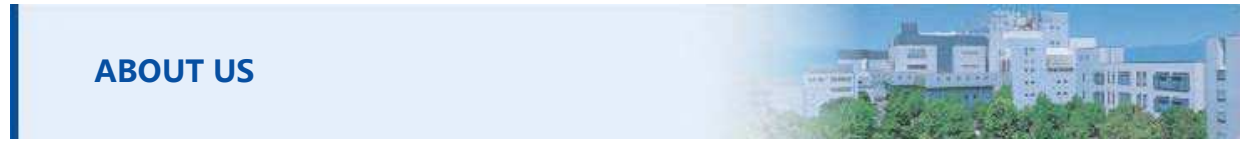
PARTNER



- [> About Us](#)
- [> Terms of use](#)
- [> Site Map](#)
- [> News](#)
- [> Privacy policy](#)
- [> Contact Us](#)



Home > ABOUT US



BROADCHIP TECHNOLOGY GROUP Co., Ltd. is a semiconductor fabless design company which was founded in Silicon Valley, USA by a group of entrepreneurs. Our goal is to provide high performance, high quality, cost effective analog and mixed-signal IC solutions to our customers.

We will utilize the advanced analog design expertise and innovation ideas from Silicon Valley and combine with the high quality science and engineer resources in China to build up a technology leading semiconductor company.

Broadchip will focus on designing, developing, and marketing a broad range of high performance,high quality analog and mixed signal integrated circuit products targeting toward broad industrial, computer, communication, and consumer markets. The power management IC will be company's main product line, its main applications will be portable device like cell phone, MP3/4 Players, PDA, digital camera, the computer, HDTV, LCD display, automobile electron and so on, the company will also provide the high quality technical service and the technical support to the customers.

Products List

- Power Management
 - BATTERY CHARGERS
 - DC-DC
- LED Driver
 - Backlighting
 - Parallel constant current
 - Serial step-up DC/DC
 - Multi-purpose
 - FLASH LED DRIVERS
- Analog Switch
 - SPQT
 - DPDT
 - USB/Audio
- Home Appliance
 - Curler/straighter
- SIM Card Controller
 - Dual SIM Card Controller
- Audio PA
 - Class AB
- Amplifiers & Comparator
 - CMOS Low Noise Amplifier
 - CMOS Highspeed Amplifier

ABOUT US

PRODUCTS

NEWS

SOLUTION

JOB

CONTACT US



[› News](#) [› Privacy policy](#) [› Contact Us](#)



EXHIBIT D



BROADCHIP

设为首页 | 加入收藏

搜索

Home

About US

Products

News

Solutions

Contact

简体中文

Products

- ▶ SIM Card Controller
 - Dual SIM Card Controller
- ▶ Analog Switch
 - SPQT
 - DPDT
 - USB/Audio
 - Analog Switch for Class D
- ▶ LED Driver
 - Backlighting
 - Multi-purpose
- ▶ Audio PA
 - Class AB
 - Class D
- ▶ Home Appliance
 - Curler/straightener
- ▶ Power Management
 - Half bridge driver
 - DC-DC
- ▶ Amplifiers & Comparator
 - CMOS Low Noise Amplifier

新闻中心

>>more..

最新产品 BCT4321N
BCT3299

公司简介

BROADCHIP TECHNOLOGY GROUP LTD. (广芯电子) is a semiconductor fabless design company which was founded in Silicon Valley, USA by a group of entrepreneurs. Our goal is to provide high performance, high quality, cost effective analog and mixed-signal IC solutions to our customers. We will utilize the advanced analog design expertise and innovation ideas from Silicon Valley and combine with 详情>>

解决方案

- 手机等消费类电子
- 通信与网络
- 计算与存储
- 汽车电子
- 测量与控制

>>更多解决方案

技术支持

Contact US

Broadchip Technology Group
Ltd.

Add: 421 Hongcao

Road, Building

67, Suite1006, Xuhui

District, Shanghai, China (200233)

Tel: 86-21-64472383

86-21-64472385

Fax: 86-21-64472183

Email: jldai@broadchip.com

Broadchip, Connecting the Real World!



* ADC

Copyright © 2002-2009 广芯电子技术(上海)有限公司 版权所有 技术支持: 东方企业网 ICP备: 沪ICP备08000755号

EXHIBIT E

1. The Post Registration "Maintenance Tab" has been temporarily disabled. It will return soon.

2. TSDR now displays information regarding [TM5 Common Status Descriptors](#).

STATUS		DOCUMENTS		Back to Search			Print
Generated on:		This page was generated by TSDR on 2016-06-24 20:40:11 EDT					
Mark:		CONNECTING EVERYTHING					
		CONNECTING EVERYTHING					
US Serial Number:		75909155		Application Filing Date:		Feb. 04, 2000	
US Registration Number:		2601945		Registration Date:		Jul. 30, 2002	
Register:		Principal					
Mark Type:		Trademark, Service Mark					
TM5 Common Status Descriptor:		<div></div> LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.					
Status:		The registration has been renewed.					
Status Date:		Mar. 27, 2012					
Publication Date:		Jun. 19, 2001		Notice of Allowance Date:		Sep. 11, 2001	
▼ Mark Information ▲ Collapse All							
Mark Literal Elements:		CONNECTING EVERYTHING					
Standard Character Claim:		No					
Mark Drawing Type:		1 - TYPESET WORD(S) /LETTER(S) /NUMBER(S)					
▼ Related Properties Information							
International Registration Number:		0988173					
International Application(s) /Registration(s) Based on this Property:		A0014585/0988173					
▼ Goods and Services							
Note: The following symbols indicate that the registrant/owner has amended the goods/services: <ul style="list-style-type: none">• Brackets [...] indicate deleted goods/services;• Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and• Asterisks *..* identify additional (new) wording in the goods/services.							
For:		COMPUTER HARDWARE; INTEGRATED CIRCUITS; AND SOFTWARE FOR CONTROLLING AND USING INTEG					
International Class(es):		009 - Primary Class		U.S Class(es):		021, 023, 026, 036, 038	
Class Status:		ACTIVE					
Basis:		1(a)					

First Use: Mar. 13, 2002		Use in Commerce: Mar. 13, 2002	
For: DESIGN OF COMPUTER HARDWARE, INTEGRATED CIRCUITS, COMMUNICATIONS HARDWARE AND SOFTWARE COMPUTER NETWORKS FOR OTHERS			
International Class(es): 042 - Primary Class		U.S Class(es): 100, 101	
Class Status: ACTIVE			
Basis: 1(a)			
First Use: Mar. 14, 2002		Use in Commerce: Mar. 14, 2002	
▼ Basis Information (Case Level)			
Filed Use: No		Currently Use: Yes	
Filed ITU: Yes		Currently ITU: No	
Filed 44D: No		Currently 44D: No	
Filed 44E: No		Currently 44E: No	
Filed 66A: No		Currently 66A: No	
Filed No Basis: No		Currently No Basis: No	
▼ Current Owner(s) Information			
Owner Name: Broadcom Corporation			
Owner Address: 5300 California Avenue Irvine, CALIFORNIA UNITED STATES 92617			
Legal Entity Type: CORPORATION		State or Country Where Organized: CALIFORNIA	
▼ Attorney/Correspondence Information			
Attorney of Record			
Attorney Name: Susan Natland		Docket Number: BROC.138T	
Attorney Primary Email Address: efiling@kmob.com		Attorney Email Authorized: Yes	
Correspondent			
Correspondent Name/Address: Susan Natland KNOBBE, MARTENS, OLSON & BEAR LLP 14TH FLOOR 2040 MAIN STREET IRVINE, CALIFORNIA UNITED STATES 92614			
Phone: 949-760-0404		Fax: 949-760-9502	
Correspondent e-mail: efiling@kmob.com		Correspondent e-mail Authorized: Yes	
Domestic Representative - Not Found			
▼ Prosecution History			
Date	Description	Proceeding Number	
Feb. 17, 2016	ASSIGNMENT OF OWNERSHIP NOT UPDATED AUTOMATICALLY		
Mar. 27, 2012	NOTICE OF ACCEPTANCE OF SEC. 8 & 9 - E-		


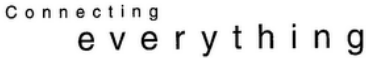

	MAILED	
Mar. 27, 2012	REGISTERED AND RENEWED (FIRST RENEWAL - 10 YRS)	76533
Mar. 27, 2012	REGISTERED - SEC. 8 (10-YR) ACCEPTED/SEC. 9 GRANTED	76533
Mar. 27, 2012	CASE ASSIGNED TO POST REGISTRATION PARALEGAL	76533
Mar. 09, 2012	TEAS SECTION 8 & 9 RECEIVED	
Aug. 26, 2008	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	77315
Aug. 26, 2008	ASSIGNED TO PARALEGAL	77315
Jul. 16, 2008	ASSIGNED TO PARALEGAL	76293
Jul. 03, 2008	TEAS SECTION 8 & 15 RECEIVED	
Dec. 31, 2007	CASE FILE IN TICRS	
Apr. 06, 2007	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	88888
Apr. 06, 2007	TEAS CHANGE OF OWNER ADDRESS RECEIVED	
May 22, 2006	ATTORNEY REVOKED AND/OR APPOINTED	
May 22, 2006	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
May 01, 2006	TEAS CHANGE OF CORRESPONDENCE RECEIVED	
Jul. 30, 2002	REGISTERED-PRINCIPAL REGISTER	
May 24, 2002	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
May 03, 2002	CORRESPONDENCE RECEIVED IN LAW OFFICE	
May 03, 2002	PAPER RECEIVED	
Apr. 18, 2002	NON-FINAL ACTION MAILED	
Apr. 12, 2002	STATEMENT OF USE PROCESSING COMPLETE	
Mar. 28, 2002	USE AMENDMENT FILED	
Mar. 28, 2002	PAPER RECEIVED	
Apr. 03, 2002	EXTENSION 1 GRANTED	
Mar. 11, 2002	EXTENSION 1 FILED	
Mar. 14, 2002	PAPER RECEIVED	
Sep. 11, 2001	NOA MAILED - SOU REQUIRED FROM APPLICANT	
Jun. 19, 2001	PUBLISHED FOR OPPOSITION	
Jun. 06, 2001	NOTICE OF PUBLICATION	
Jan. 12, 2001	APPROVED FOR PUB - PRINCIPAL REGISTER	

Jan. 08, 2001	EXAMINER'S AMENDMENT MAILED	
Dec. 21, 2000	FINAL REFUSAL MAILED	
Sep. 11, 2000	CORRESPONDENCE RECEIVED IN LAW OFFICE	
Jul. 21, 2000	NON-FINAL ACTION MAILED	
Jul. 11, 2000	ASSIGNED TO EXAMINER	77762
Jul. 06, 2000	ASSIGNED TO EXAMINER	69923
Maintenance Filings or Post Registration Information		
Affidavit of Continued Use:	Section 8 - Accepted	
Affidavit of Incontestability:	Section 15 - Accepted	
Renewal Date:	Jul. 30, 2012	
TM Staff and Location Information		
TM Staff Information - None		
File Location		
Current Location:	GENERIC WEB UPDATE	Date in Location: Mar. 27, 2012
Assignment Abstract Of Title Information		
Summary		Conveyance Filings
Total Assignments:	1	Registrant: Broadcom Corporation
Assignment 1 of 1		Expand All
Conveyance: TRADEMARK SECURITY AGREEMENT		
Reel/Frame:	5729/0940	Pages: 20
Date Recorded:	Feb. 11, 2016	
Supporting Documents:	assignment-tm-5729-0940.pdf	
Assignor		
Name:	BROADCOM CORPORATION	Execution Date: Feb. 01, 2016
Legal Entity Type:	CORPORATION	State or Country Where Organized: CALIFORNIA
Assignee		
Name:	BANK OF AMERICA, N.A., AS COLLATERAL AGENT	
Legal Entity Type:	NATIONAL ASSOCIATION	State or Country Where Organized: UNITED STATES
Address:	101 N TRYON ST. CHARLOTTE, NORTH CAROLINA 28255	
Correspondent		
Correspondent Name:	LATHAM & WATKINS LLP	
Correspondent Address:	650 TOWN CENTER DRIVE, SUITE 2000 COSTA MESA, CA 92626	
Domestic Representative - Not Found		

Proceedings

1. The Post Registration "Maintenance Tab" has been temporarily disabled. It will return soon.

2. TSDR now displays information regarding [TM5 Common Status Descriptors](#).

STATUS		DOCUMENTS		Back to Search		 Print	
Generated on:		This page was generated by TSDR on 2016-06-24 20:41:58 EDT					
Mark:		CONNECTING EVERYTHING					
US Serial Number:		76300157		Application Filing Date:		Aug. 14, 2001	
US Registration Number:		2984436		Registration Date:		Aug. 16, 2005	
Register:		Principal					
Mark Type:		Trademark, Service Mark					
TM5 Common Status Descriptor:				LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.			
Status:		The registration has been renewed.					
Status Date:		Jan. 06, 2016					
Publication Date:		May 24, 2005					
▼ Mark Information		▲ Collapse All					
Mark Literal Elements:		CONNECTING EVERYTHING					
Standard Character Claim:		No					
Mark Drawing Type:		5 - AN ILLUSTRATION DRAWING WITH WORD(S) /LETTER(S)/ NUMBER(S) INSTYLIZED FORM					
▼ Goods and Services							
Note:		The following symbols indicate that the registrant/owner has amended the goods/services: <ul style="list-style-type: none">• Brackets [...] indicate deleted goods/services;• Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and• Asterisks *..* identify additional (new) wording in the goods/services.					
For:		COMPUTER HARDWARE, INTEGRATED CIRCUITS AND SOFTWARE FOR CONTROLLING AND USING INTEG					
International Class(es):		009 - Primary Class		U.S Class(es):		021, 023, 026, 036, 038	
Class Status:		ACTIVE					
Basis:		1(a)					
First Use:		Mar. 13, 2002		Use in Commerce:		Mar. 13, 2002	
For:		DESIGN FOR OTHERS OF COMPUTERS, INTEGRATED CIRCUITS, COMMUNICATIONS HARDWARE AND SOF NETWORKS					
International Class(es):		042 - Primary Class		U.S Class(es):		100, 101	
Class Status:		ACTIVE					

Basis: 1(a)	
First Use: Mar. 14, 2002	Use in Commerce: Mar. 14, 2002

▼ Basis Information (Case Level)

Filed Use:	No	Currently Use:	Yes	Amended Use:	
Filed ITU:	Yes	Currently ITU:	No	Amended ITU:	
Filed 44D:	No	Currently 44D:	No	Amended 44D:	
Filed 44E:	No	Currently 44E:	No	Amended 44E:	
Filed 66A:	No	Currently 66A:	No		
Filed No Basis:	No	Currently No Basis:	No		

▼ Current Owner(s) Information

Owner Name:	Broadcom Corporation				
Owner Address:	5300 California Avenue Irvine, CALIFORNIA UNITED STATES 92617				
Legal Entity Type:	CORPORATION	State or Country Where Organized:	CALIFORNIA		

▼ Attorney/Correspondence Information

Attorney of Record

Attorney Name:	Susan M. Natland	Docket Number:	BROC.180T		
Attorney Primary Email Address:	efiling@knobbe.com	Attorney Email Authorized:	Yes		

Correspondent

Correspondent Name/Address:	Susan M. Natland KNOBBE, MARTENS, OLSON & BEAR LLP 2040 Main Street, 14th Floor IRVINE, CALIFORNIA UNITED STATES 92614				
Phone:	949-760-0404	Fax:	949-760-9502		
Correspondent e-mail:	efiling@knobbe.com	Correspondent e-mail Authorized:	Yes		


Domestic Representative - Not Found

▼ Prosecution History

Date	Description	Proceeding Number
Feb. 17, 2016	ASSIGNMENT OF OWNERSHIP NOT UPDATED AUTOMATICALLY	
Jan. 06, 2016	NOTICE OF ACCEPTANCE OF SEC. 8 & 9 - E-MAILED	
Jan. 06, 2016	REGISTERED AND RENEWED (FIRST RENEWAL - 10 YRS)	75461
Jan. 06, 2016	REGISTERED - SEC. 8 (10-YR) ACCEPTED/SEC. 9 GRANTED	75461
Dec. 22, 2015	TEAS RESPONSE TO OFFICE ACTION-POST REG RECEIVED	


Sep. 17, 2015	POST REGISTRATION ACTION MAILED - SEC. 8 & 9	75461
Sep. 17, 2015	POST REGISTRATION ACTION MAILED - SEC. 8 & 9	75461
Sep. 16, 2015	CASE ASSIGNED TO POST REGISTRATION PARALEGAL	75461
Aug. 17, 2015	TEAS SECTION 8 & 9 RECEIVED	
Sep. 17, 2011	NOTICE OF ACCEPTANCE OF SEC. 8 & 15 - E-MAILED	
Sep. 16, 2011	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	71378
Sep. 16, 2011	CASE ASSIGNED TO POST REGISTRATION PARALEGAL	71378
Aug. 15, 2011	TEAS SECTION 8 & 15 RECEIVED	
Apr. 06, 2007	APPLICANT/CORRESPONDENCE CHANGES (NON-RESPONSIVE) ENTERED	88888
Apr. 06, 2007	TEAS CHANGE OF OWNER ADDRESS RECEIVED	
May 22, 2006	ATTORNEY REVOKED AND/OR APPOINTED	
May 22, 2006	TEAS REVOKE/APPOINT ATTORNEY RECEIVED	
May 01, 2006	TEAS CHANGE OF CORRESPONDENCE RECEIVED	
Aug. 16, 2005	REGISTERED-PRINCIPAL REGISTER	
May 24, 2005	PUBLISHED FOR OPPOSITION	
May 04, 2005	NOTICE OF PUBLICATION	
Feb. 01, 2005	LAW OFFICE PUBLICATION REVIEW COMPLETED	76538
Jan. 28, 2005	ASSIGNED TO LIE	76538
Jan. 26, 2005	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jan. 26, 2005	USE AMENDMENT ACCEPTED	
Jan. 26, 2005	ASSIGNED TO EXAMINER	78325
Jan. 26, 2005	AMENDMENT FROM APPLICANT ENTERED	78325
Dec. 02, 2004	CORRESPONDENCE RECEIVED IN LAW OFFICE	78325
Jan. 26, 2005	ASSIGNED TO EXAMINER	78325
Dec. 02, 2004	AMENDMENT FROM APPLICANT ENTERED	78288
Nov. 01, 2004	CORRESPONDENCE RECEIVED IN LAW OFFICE	78288
Dec. 02, 2004	LIE CHECKED SUSP - TO ATTY FOR ACTION	78413
Nov. 18, 2004	ASSIGNED TO LIE	78288
Nov. 01, 2004	PAPER RECEIVED	

Oct. 21, 2003	CASE FILE IN TICRS	
Oct. 10, 2002	ASSIGNED TO EXAMINER	60785
May 15, 2002	AMENDMENT TO USE PROCESSING COMPLETE	
Apr. 01, 2002	USE AMENDMENT FILED	
Apr. 01, 2002	CORRESPONDENCE RECEIVED IN LAW OFFICE	
Apr. 01, 2002	PAPER RECEIVED	
Nov. 05, 2001	LETTER OF SUSPENSION MAILED	
Oct. 02, 2001	ASSIGNED TO EXAMINER	78325
Oct. 02, 2001	ASSIGNED TO EXAMINER	78325
Sep. 28, 2001	ASSIGNED TO EXAMINER	72517
Sep. 26, 2001	ASSIGNED TO EXAMINER	78432
Maintenance Filings or Post Registration Information		
Affidavit of Continued Use:	Section 8 - Accepted	
Affidavit of Incontestability:	Section 15 - Accepted	
Renewal Date:	Aug. 16, 2015	
TM Staff and Location Information		
TM Staff Information - None		
File Location		
Current Location:	GENERIC WEB UPDATE	Date in Location: Jan. 06, 2016
Assignment Abstract Of Title Information		
Summary		Conveyance Filings
Total Assignments:	1	Registrant: Broadcom Corporation
Assignment 1 of 1		Expand All
Conveyance:	TRADEMARK SECURITY AGREEMENT	
Reel/Frame:	5729/0940	Pages: 20
Date Recorded:	Feb. 11, 2016	
Supporting Documents:	assignment-tm-5729-0940.pdf	
Assignor		
Name:	BROADCOM CORPORATION	Execution Date: Feb. 01, 2016
Legal Entity Type:	CORPORATION	State or Country Where Organized: CALIFORNIA
Assignee		
Name:	BANK OF AMERICA, N.A., AS COLLATERAL AGENT	
Legal Entity Type:	NATIONAL ASSOCIATION	State or Country Where Organized: UNITED STATES
Address:	101 N TRYON ST. CHARLOTTE, NORTH CAROLINA 28255	

Correspondent	
Correspondent Name:	LATHAM & WATKINS LLP
Correspondent Address:	650 TOWN CENTER DRIVE, SUITE 2000 COSTA MESA, CA 92626
Domestic Representative - Not Found	
 Proceedings - Click to Load	

1. The Post Registration "Maintenance Tab" has been temporarily disabled. It will return soon.
2. TSDR now displays information regarding [TM5 Common Status Descriptors](#).

STATUSDOCUMENTS

[Back to Search](#)Print

Generated on:

This page was generated by TSDR on 2016-06-24 20:42:35 EDT

Mark:

CONNECTING EVERYTHING

CONNECTING EVERYTHING

US Serial Number:

77836583

Application Filing Date:

Sep. 28, 2009

US Registration Number:

3787269

Registration Date:

May 11, 2010


Register:

Principal

Mark Type:

Trademark

TM5 Common Status Descriptor:

LIVE/REGISTRATION/Issued and Active

The trademark application has been registered with the Office.

Status:

A Sections 8 and 15 combined declaration has been accepted and acknowledged.

Status Date:

Feb. 25, 2016

Publication Date:

Feb. 23, 2010

▼ Mark Information

▲ Collapse All

Mark Literal Elements:

CONNECTING EVERYTHING

Standard Character Claim:

Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Mark Drawing Type:

4 - STANDARD CHARACTER MARK

▼ Related Properties Information

Claimed Ownership of US Registrations:

[2601945](#), [2984436](#)

▼ Goods and Services

Note:

The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *.* identify additional (new) wording in the goods/services.

For:

Semiconductors; computer chipsets; semiconductors, computer chipsets and computer software for communication, communication and connectivity; firmware for using and controlling wireless broadband communication technology a communication and wireless communication

International Class(es):

009 - Primary Class

U.S Class(es):

021, 023, 026, 036, 038

Class Status:

ACTIVE

Basis:

1(a)

First Use: Mar. 14, 2002		Use in Commerce: Mar. 14, 2002	
▼ Basis Information (Case Level)			
Filed Use: Yes		Currently Use: Yes	
Filed ITU: No		Currently ITU: No	
Filed 44D: No		Currently 44D: No	
Filed 44E: No		Currently 44E: No	
Filed 66A: No		Currently 66A: No	
Filed No Basis: No		Currently No Basis: No	
▼ Current Owner(s) Information			
Owner Name: Broadcom Corporation			
Owner Address: 5300 California Avenue Irvine, CALIFORNIA UNITED STATES 92617			
Legal Entity Type: CORPORATION		State or Country Where Organized: CALIFORNIA	
▼ Attorney/Correspondence Information			
Attorney of Record			
Attorney Name: Susan M. Natland		Docket Number: BROC.774T	
Attorney Primary Email Address: efiling@knobbe.com		Attorney Email Authorized: Yes	
Correspondent			
Correspondent Name/Address: SUSAN M. NATLAND KNOBBE MARTENS OLSON & BEAR LLP 2040 Main Street, 14th Floor IRVINE, CALIFORNIA UNITED STATES 92614-8214			
Phone: (949) 760-0404		Fax: (949) 760-9502	
Correspondent e-mail: efiling@knobbe.com		Correspondent e-mail Authorized: Yes	
Domestic Representative - Not Found			
▼ Prosecution History			
Date	Description	Proceeding Number	
Feb. 25, 2016	NOTICE OF ACCEPTANCE OF SEC. 8 & 15 - E-MAILED		
Feb. 25, 2016	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	68502	
Feb. 25, 2016	CASE ASSIGNED TO POST REGISTRATION PARALEGAL	68502	
Feb. 17, 2016	ASSIGNMENT OF OWNERSHIP NOT UPDATED AUTOMATICALLY		
Dec. 18, 2015	TEAS SECTION 8 & 15 RECEIVED		
May 11, 2010	REGISTERED-PRINCIPAL REGISTER		
Feb. 23, 2010	OFFICIAL GAZETTE PUBLICATION		

CONFIRMATION E-MAILED		
Feb. 23, 2010	PUBLISHED FOR OPPOSITION	
Jan. 20, 2010	LAW OFFICE PUBLICATION REVIEW COMPLETED	71441
Jan. 20, 2010	ASSIGNED TO LIE	71441
Dec. 29, 2009	APPROVED FOR PUB - PRINCIPAL REGISTER	
Dec. 29, 2009	EXAMINER'S AMENDMENT ENTERED	88888
Dec. 29, 2009	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	6328
Dec. 29, 2009	EXAMINERS AMENDMENT E-MAILED	6328
Dec. 29, 2009	EXAMINERS AMENDMENT -WRITTEN	80813
Dec. 24, 2009	ASSIGNED TO EXAMINER	80813
Oct. 06, 2009	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Oct. 01, 2009	NEW APPLICATION ENTERED IN TRAM	
Maintenance Filings or Post Registration Information		
Affidavit of Continued Use:	Section 8 - Accepted	
Affidavit of Incontestability:	Section 15 - Accepted	
TM Staff and Location Information		
TM Staff Information - None		
File Location		
Current Location:	TMO LAW OFFICE 114	Date in Location: Feb. 25, 2016
Assignment Abstract Of Title Information		
Summary		
Total Assignments:	1	Registrant: Broadcom Corporation
Assignment 1 of 1		Expand All
Conveyance: TRADEMARK SECURITY AGREEMENT		
Reel/Frame:	5729/0940	Pages: 20
Date Recorded:	Feb. 11, 2016	
Supporting Documents:	assignment-tm-5729-0940.pdf	
Assignor		
Name:	BROADCOM CORPORATION	Execution Date: Feb. 01, 2016
Legal Entity Type:	CORPORATION	State or Country Where Organized: CALIFORNIA
Assignee		
Name:	BANK OF AMERICA, N.A., AS COLLATERAL AGENT	
Legal Entity Type:	NATIONAL ASSOCIATION	State or Country Where Organized: UNITED STATES

Address: 101 N TRYON ST.
CHARLOTTE, NORTH CAROLINA 28255

Correspondent

Correspondent Name: LATHAM & WATKINS LLP

Correspondent Address: 650 TOWN CENTER DRIVE, SUITE 2000
COSTA MESA, CA 92626

Domestic Representative - Not Found

 **Proceedings - Click to Load**

EXHIBIT F



Mobile & Wireless



Home > Products > Bluetooth > Bluetooth RF Silicon and Software Solutions > BCM4329 - Low-Power 802.11n with Bluetooth® 2.1 + EDR and FM (Tx and Rx)



adjust font size:



BCM4329 - Low-Power 802.11n with Bluetooth® 2.1 + EDR and FM (Tx and Rx)

The Broadcom BCM4329 integrates a complete IEEE 802.11 a/b/g/n system (MAC/baseband/radio) with Bluetooth® 2.1 + EDR (Enhanced Data Rate), and FM radio receiver and transmitter. By combining several proven wireless technologies onto a single silicon die, the BCM4329 enables mobile devices to support today's toughest media applications -- without impacting device size or battery life.

The BCM4329 eliminates the barriers of adding the latest wireless connectivity features to small, battery-operated devices. In addition to bringing greater Wi-Fi throughput and coverage to mobile consumer electronics, the BCM4329 is Broadcom's smallest and lowest cost dual-band 802.11n solution. It features integrated 2.4 GHz and 5 GHz WLAN CMOS power amplifiers, which reduce BoM costs while maintaining superior performance. The BCM4329 also utilizes advanced design techniques and process technologies to reduce active and idle power consumption and extend battery life.

BROWSE PRODUCTS

- ▲ Browse by Application
- ▲ Browse by Brand
- ▲ Browse by Technology
- ▲ Products A to Z

PRODUCT NEWS

- ▲ **02/09/11** - Broadcom Announces Smartphone Baseband Chip with HSPA+ Cellular Modem and Merlyn™ Applications Processor Capable of 1080p Video and Graphics
- ▲ **02/09/11** - Broadcom's New Smartphone Chip Delivers Android™ with Advanced Graphics at an Affordable Price Point
- ▲ **02/09/10** - Broadcom Demonstrates Android™ Support Across Its Wireless Connectivity Products

Features

Product Info

Applications

- ▲ Broadcom's most integrated 65 nm single-chip combo device with single-band (2.4 GHz) 802.11b/g/n or dual-band (2.4 GHz and 5 GHz) 802.11a/b/g/n, plus Bluetooth 2.1 + EDR and FM receiver and transmitter features
- ▲ Offers one of the industry's most advanced Bluetooth/Wi-Fi coexistence technologies to ensure the best possible user experience
- ▲ Full featured, on-chip Power Management Unit supporting direct battery (2.3V to 5.5V) connection
- ▲ Bluetooth Core Specification Version 2.1 + EDR compliant with provisions supporting future specifications and Bluetooth Class 1 or Class 2 transmitter operation
- ▲ Supports 802.11n performance and range features, such as Space Time Block Coding (STBC), Short Guard Interval (SGI), A-MPDU aggregation, Block Ack, Greenfield, RIFS



EXHIBIT G

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Broadcom Corporation,

Opposer,

v.

Broadchip Technology Group Ltd.,

Applicant.

Opposition No.: 91198660

Subject Mark: BROADCHIP
Application No.: 77/855,572

OPPOSER'S FIRST SET OF REQUESTS FOR ADMISSIONS NOS. 1-206

Pursuant to the Rules of Practice of the United States Patent and Trademark Office, and the applicable Federal Rules of Civil Procedure ("FRCP"), Applicant is hereby required to admit or deny, in writing and under oath, each of the following Requests for Admissions ("Requests").

DEFINITIONS

A. The term "Applicant" shall refer to Broadchip Technology Group Ltd., and any present or former owner, officer (including, but not limited to, Jerry Dai), director, employee, servant, agent, attorney or other representative acting on behalf of it, and shall include any related entity, parent corporation, or wholly-owned or partially-owned subsidiary, predecessor, successor, or affiliate either within the United States or a foreign country.

B. The term "Opposer" shall refer to Broadcom Corporation.

C. The term "You" or "Your" shall mean the Applicant and/or the party or person to whom the Request is propounded, all agents, employees, servants, attorneys, and all other representatives, and persons over whom the person or party to whom the Request is propounded has the right to or does control or direct any activities.

D. As used herein, the term “document” is used in the broadest sense permitted by the Federal Rules of Civil Procedure and expressly includes without limitation any tangible thing upon which information is or has been stored, recorded, or communicated and any written, printed, typed, and visually or aurally reproduced material of any kind, whether or not privileged, such as (by way of example and not by way of limitation) correspondence, letters, notes, memoranda, diaries, invoices, purchase orders, records, minutes, bills, contracts, agreements, orders, receipts, price lists, studies, drawings or sketches, telephone messages, films, pictures, photographs, electronic mail, microfilm, magnetic media (including but not limited to hard disks or drives, floppy disks, compact disks, CD-ROMs, DVD-ROMs, and magnetic tapes of any kind) tapes or discs capable of being mechanically read, advertising or promotional literature, operating manuals or instruction bulletins, cables or telegrams, maps, charts, surveys, test data, reports, tape or other recordings, HTML code, and Internet website pages, every copy of every such writing or record where the original is not in the possession, custody, or control of Applicant, and every copy of every such writing or record where such copy is not an identical copy of the original or where such copy contains any commentary that does not appear on the original.

E. The term “thing” shall mean all tangible objects of any type, composition, construction, or nature.

F. The term “communication(s)” includes the disclosure, transfer, or exchange of information by any means, written, verbal, electronic, or otherwise.

G. The term “concerning” means relating to, referring to, describing, evidencing or constituting.

H. The term “all” or “each” shall be construed to include all and each.

I. The term “and” shall be construed to include “or” and *vice versa*, and shall be the logical equivalent to “and/or,” as necessary in order to bring within the scope of the Request all responses which might otherwise be construed as outside its scope.

J. The use of the singular form of any word also includes the plural and *vice versa*.

K. The phrases “used in commerce,” “use in United States commerce,” “used in commerce” and “used in United States commerce,” and similar phrases, shall mean and refer to the definition provided under 15 U.S.C. § 1127.

L. The term “person” shall include both natural persons and corporate or other business entities, whether or not in the employ of Applicant, and the acts and knowledge of a person are defined to include the acts and knowledge of that person’s directors, officers, members, employees, representatives, servants, agents, and attorneys.

M. The term “trademark” or “mark” includes trademarks, service marks, collective marks, certification marks, and trade names as defined in 15 U.S.C. § 1127.

N. The term “Applicant’s Mark” shall mean the mark as shown in U.S. Application Serial No. 77/855,572.

O. The terms “Opposer’s Marks” shall mean the marks as alleged by Opposer in the Notice of Opposition in Opposition No. 91198660.

P. The term “Opposer’s Goods” shall mean and refer to all of the goods covered under Opposer’s Marks or as alleged in the Notice of Opposition in Opposition No. 91198660.

Q. The term “Opposer’s Services” shall mean and refer to all of the services covered under Opposer’s Marks or as alleged in the Notice of Opposition in Opposition No. 91198660.

R. The term “Opposer’s Goods/Services” shall mean and refer to all of the goods/services covered under Opposer’s Marks or as alleged in the Notice of Opposition in Opposition No. 91198660.

S. The term “Applicant’s Goods” shall mean the goods identified in U.S. Application Serial No. 77/855,572.

T. The term “Applicant’s Services” shall mean the services identified in U.S. Application Serial No. 77/855,572.

U. The term “Applicant’s Goods/Services” shall mean the goods/services identified in U.S. Application Serial No. 77/855,572.

V. The term “Applicant’s Application” refers to U.S. Application Serial No. 77/855,572.

W. The term “U.S.” means “United States”.

GENERAL INSTRUCTIONS

1. If you claim that any information requested is privileged, please provide all information falling within the scope of the Admission Request which is not privileged, and identify with sufficient particularity for purposes of a Motion to Compel each item of information, document or thing, separately, with respect to which you claim a privilege, and state:

- a. the basis on which the privilege is claimed;
- b. the author of the document, if applicable;
- c. each individual or other person to whom the document or copy thereof was sent or otherwise disclosed;
- d. the date of the information or document;
- e. the type of information or document (e.g., letter, memorandum, etc.); and
- f. the general subject matter of the information or document.

You are not requested to provide privileged information or information for which you claim privilege, but only to identify such information, document or thing.

2. Applicant’s responses to the following Admission Requests are to be promptly

supplemented to include subsequently acquired information in accordance with the requirements of Rule 26(e) of the FRCP.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that Applicant has never received compensation (monetary or otherwise) as a result of the sale of Applicant's Goods to a U.S. customer, a U.S. citizen, a U.S. resident, a U.S. national or a U.S. company.

REQUEST FOR ADMISSION NO. 2:

Admit that Applicant has received compensation (monetary or otherwise) as a result of the sale of Applicant's Goods to a U.S. customer, a U.S. citizen, a U.S. resident, a U.S. national or a U.S. company.

REQUEST FOR ADMISSION NO. 3:

Admit that U.S. consumers can not view the website www.broadchip.com.

REQUEST FOR ADMISSION NO. 4:

Admit that U.S. consumers can view the website www.broadchip.com.

REQUEST FOR ADMISSION NO. 5:

Admit that persons residing in the United States can not view the website www.broadchip.com.

REQUEST FOR ADMISSION NO. 6:

Admit that persons residing in the U.S. can view the website www.broadchip.com.

REQUEST FOR ADMISSION NO. 7:

Admit that Jerry Dai and Zhongwei Dai are the same person.

REQUEST FOR ADMISSION NO. 8:

Admit that the website www.broadchip.com can be viewed in English.

REQUEST FOR ADMISSION NO. 9:

Admit that the domain name www.broadchip.com was registered to drive business and Internet traffic to Applicant or companies affiliated with or related to Applicant.

REQUEST FOR ADMISSION NO. 10:

Admit that the website www.broadchip.com was registered to promote goods under Applicant's Mark.

REQUEST FOR ADMISSION NO. 11:

Admit that Applicant has a U.S. or California state Tax ID Number.

REQUEST FOR ADMISSION NO. 12:

Admit that Broadchip Semiconductor, Inc. (California) has a U.S. or California state Tax ID Number.

REQUEST FOR ADMISSION NO. 13:

Admit that one or more officers, directors, owners or employees of Applicant paid U.S. income or U.S. property tax in 2011.

REQUEST FOR ADMISSION NO. 14:

Admit that one or more officers, owners, directors, employees or agents of Applicant paid U.S. income or U.S. property tax in 2010.

REQUEST FOR ADMISSION NO. 15:

Admit that Applicant has paid U.S. federal or state taxes.

REQUEST FOR ADMISSION NO. 16:

Admit that one or more officers, owners, directors, employees or agents of Applicant paid U.S. income or U.S. property tax in 2009.

REQUEST FOR ADMISSION NO. 17:

Admit that no cell phones, mobile phone or smart phones entering the U.S. market have

included Applicant's Goods as a component part or otherwise.

REQUEST FOR ADMISSION NO. 18:

Admit that no third party goods entering the U.S. market have ever included Applicant's Goods as a component part or otherwise.

REQUEST FOR ADMISSION NO. 19:

Admit that no cell phones, mobile phone or smart phones purchased by a U.S. customer, a U.S. citizen, a U.S. resident, a U.S. national or a U.S. company have included Applicant's Goods as a component part or otherwise.

REQUEST FOR ADMISSION NO. 20:

Admit that no third party goods purchased by a U.S. customer, a U.S. citizen, a U.S. resident, a U.S. national or a U.S. company have included Applicant's Goods as a component part or otherwise.

REQUEST FOR ADMISSION NO. 21:

Admit that U.S. distributors and suppliers provide or broker Applicant's goods.

REQUEST FOR ADMISSION NO. 22:

Admit that U.S. distributors and suppliers make Applicant's goods available to U.S. customers via the Internet and otherwise.

REQUEST FOR ADMISSION NO. 23:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer.

REQUEST FOR ADMISSION NO. 24:

Admit that prior to selecting Applicant's Mark, Applicant was aware of some, if not all of, Opposer's Marks.

REQUEST FOR ADMISSION NO. 25:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of

the mark set forth in U.S. Trademark Registration No. 2595174.

REQUEST FOR ADMISSION NO. 26:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 2392925.

REQUEST FOR ADMISSION NO. 27:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 2132930.

REQUEST FOR ADMISSION NO. 28:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 2625799.

REQUEST FOR ADMISSION NO. 29:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 2326387.

REQUEST FOR ADMISSION NO. 30:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 2951950.

REQUEST FOR ADMISSION NO. 31:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 3490624.

REQUEST FOR ADMISSION NO. 32:

Admit that prior to selecting Applicant's Mark, Applicant was aware of Opposer's use of the mark set forth in U.S. Trademark Registration No. 2913502.

REQUEST FOR ADMISSION NO. 33:

Admit that prior to the filing of Applicant's Application, Applicant was aware of

Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2595174.

REQUEST FOR ADMISSION NO. 34:

Admit that prior to the filing of Applicant's Application, Applicant was aware of Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2392925.

REQUEST FOR ADMISSION NO. 35:

Admit that prior to the filing of Applicant's Application, Applicant was aware of Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2132930.

REQUEST FOR ADMISSION NO. 36:

Admit that prior to the filing of Applicant's Application, Applicant was aware of Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2625799.

REQUEST FOR ADMISSION NO. 37:

Admit that prior to the filing of Applicant's Application, Applicant was aware of Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2326387.

REQUEST FOR ADMISSION NO. 38:

Admit that prior to the filing of Applicant's Application, Applicant was aware of Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2951950.

REQUEST FOR ADMISSION NO. 39:

Admit that prior to the filing of Applicant's Application, Applicant was aware of

Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 3490624.

REQUEST FOR ADMISSION NO. 40:

Admit that prior to the filing of Applicant's Application, Applicant was aware of Opposer's federal trademark registration for the mark set forth in U.S. Trademark Registration No. 2913502.

REQUEST FOR ADMISSION NO. 41:

Admit that Applicant selected and commenced use of Applicant's Mark with the intent to benefit from the goodwill and reputation developed by Opposer in one or more of Opposer's Marks.

REQUEST FOR ADMISSION NO. 42:

Admit that Applicant filed Applicant's Application with the intent to benefit from the goodwill and reputation developed by Opposer in one or more of Opposer's Marks.

REQUEST FOR ADMISSION NO. 43:

Admit that there is a likelihood of confusion between Applicant's Mark as used in connection with Applicant's Goods/Services and Opposer's Marks as used in connection with Opposer's Goods/Services.

REQUEST FOR ADMISSION NO. 44:

Admit that Applicant, either itself or through a licensee, is currently offering the goods/services listed in Applicant's Application in the U.S.

REQUEST FOR ADMISSION NO. 45:

Admit that neither Applicant, nor anyone on behalf of Applicant, conducted a search for potentially conflicting marks prior to the filing of Applicant's Application.

REQUEST FOR ADMISSION NO. 46:

Admit that Applicant, or someone on behalf of Applicant, conducted a search for potentially conflicting marks or business names prior to the filing of Applicant's Application.

REQUEST FOR ADMISSION NO. 47:

Admit that a search for potentially conflicting marks conducted by Applicant, or on behalf of Applicant, disclosed one or more of Opposer's Marks.

REQUEST FOR ADMISSION NO. 48:

Admit that Opposer's use of one or more of Opposer's Marks predates Applicant's use of Applicant's Mark.

REQUEST FOR ADMISSION NO. 49:

Admit that Opposer's use of one or more of Opposer's Marks predates Applicant's filing of Applicant's Application.

REQUEST FOR ADMISSION NO. 50:

Admit that Opposer is the senior user of Opposer's Marks in connection with Opposer's Goods/Services, as against Applicant's use of Applicant's Mark.

REQUEST FOR ADMISSION NO. 51:

Admit that use and registration of Applicant's Mark damages Opposer's Marks.

REQUEST FOR ADMISSION NO. 52:

Admit that there has been actual confusion in the marketplace between Applicant's Mark and Opposer's Marks.

REQUEST FOR ADMISSION NO. 53:

Admit that the documents produced in response to Opposer's First Requests for Production of Documents and Things are authentic for purposes of admission into evidence during the testimony periods in this opposition proceeding.

REQUEST FOR ADMISSION NO. 54:

Admit that Applicant's Goods/Services and Opposer's Goods/Services travel through the same channels of trade.

REQUEST FOR ADMISSION NO. 55:

Admit that Applicant is using Applicant's Mark in commerce.

REQUEST FOR ADMISSION NO. 56:

Admit that Applicant used the BROADCHIP mark in commerce prior to August 1, 2007.

REQUEST FOR ADMISSION NO. 57:

Admit that Applicant has used Applicant's Mark in commerce continually since the date of first use indicated in Applicant's Applications to the present.

REQUEST FOR ADMISSION NO. 58:

Admit that Applicant filed Application No. 77/855,572 based on actual use of Applicant's mark under Section 1(a) of the Trademark Act.

REQUEST FOR ADMISSION NO. 59:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with handheld and mobile digital electronic devices in the nature of mobile data terminals and secure terminals for electronic transactions, namely, telecommunication terminal for the sending and receiving of telephone calls, faxes, electronic mail, and other digital data.

REQUEST FOR ADMISSION NO. 60:

Admit that Applicant has used Admit that Applicant has used the BROADCHIP mark in commerce in connection with MP3 and digital audio players.

REQUEST FOR ADMISSION NO. 61:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with handheld computers, personal digital assistants, electronic personal organizers, handheld

computers in the nature of electronic notepads.

REQUEST FOR ADMISSION NO. 62:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with telephones, mobile cellular telephones.

REQUEST FOR ADMISSION NO. 63:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer game consoles for use with an external display screen or monitor, videophones, cameras.

REQUEST FOR ADMISSION NO. 64:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with software for the redirection of messages, Internet e-mail, and other data to one or more electronic handheld devices from a data store on or associated with a personal computer or a server.

REQUEST FOR ADMISSION NO. 65:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with software for the synchronization of data between a remote station or device and a fixed or remote station or device.

REQUEST FOR ADMISSION NO. 66:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer hardware and software for providing integrated telephone communication with computerized global information networks.

REQUEST FOR ADMISSION NO. 67:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with semiconductors.

REQUEST FOR ADMISSION NO. 68:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer chipsets for use in transmitting data to and from a central processing unit.

REQUEST FOR ADMISSION NO. 69:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with semiconductors and computer chipsets used in transmitting data to and from a central processing unit for communication, wireless communication, industry control and connectivity.

REQUEST FOR ADMISSION NO. 70:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer software for communication, wireless communication, industry control and connectivity, namely, communication software for providing access to the Internet.

REQUEST FOR ADMISSION NO. 71:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with communications software for connecting computer network users and global computer networks.

REQUEST FOR ADMISSION NO. 72:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer software for communicating with users of hand-held computers.

REQUEST FOR ADMISSION NO. 73:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer software for wireless content delivery.

REQUEST FOR ADMISSION NO. 74:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer software for controlling and managing access server applications, industrial process control software.

REQUEST FOR ADMISSION NO. 75:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with computer firmware for using and controlling wireless broadband communication technology and to enable wireless communication, communication over the internet, and communication by connecting computer network users and global computer networks.

REQUEST FOR ADMISSION NO. 76:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with handheld and mobile digital electronic devices in the nature of mobile data terminals and secure terminals for electronic transactions, namely, telecommunication terminal for the sending and receiving of telephone calls, faxes, electronic mail, and other digital data.

REQUEST FOR ADMISSION NO. 77:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with MP3 and digital audio players.

REQUEST FOR ADMISSION NO. 78:

Admit that Applicant has not used the BROADCHIP mark in commerce on handheld computers, personal digital assistants, electronic personal organizers, handheld computers in the nature of electronic notepads.

REQUEST FOR ADMISSION NO. 79:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with telephones, mobile cellular telephones.

REQUEST FOR ADMISSION NO. 80:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer game consoles for use with an external display screen or monitor, videophones, cameras.

REQUEST FOR ADMISSION NO. 81:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with software for the redirection of messages, Internet e-mail, and other data to one or more electronic handheld devices from a data store on or associated with a personal computer or a server.

REQUEST FOR ADMISSION NO. 82:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with software for the synchronization of data between a remote station or device and a fixed or remote station or device.

REQUEST FOR ADMISSION NO. 83:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer hardware and software for providing integrated telephone communication with computerized global information networks.

REQUEST FOR ADMISSION NO. 84:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with semiconductors.

REQUEST FOR ADMISSION NO. 85:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer chipsets for use in transmitting data to and from a central processing unit.

REQUEST FOR ADMISSION NO. 86:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with semiconductors and computer chipsets used in transmitting data to and from a central processing unit for communication, wireless communication, industry control and connectivity.

REQUEST FOR ADMISSION NO. 87:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer software for communication, wireless communication, industry control and connectivity, namely, communication software for providing access to the Internet.

REQUEST FOR ADMISSION NO. 88:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with communications software for connecting computer network users and global computer networks.

REQUEST FOR ADMISSION NO. 89:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer software for communicating with users of hand-held computers.

REQUEST FOR ADMISSION NO. 90:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer software for wireless content delivery.

REQUEST FOR ADMISSION NO. 91:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer software for controlling and managing access server applications, industrial process control software.

REQUEST FOR ADMISSION NO. 92:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with computer firmware for using and controlling wireless broadband communication technology and to enable wireless communication, communication over the internet, and communication by connecting computer network users and global computer networks.

REQUEST FOR ADMISSION NO. 93:

Admit that Applicant has no bona fide intent to use the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 94:

Admit that Applicant has used the BROADCHIP mark in commerce in connection with one or more of the services in Class 42 covered in Application No. 77/855,572.

REQUEST FOR ADMISSION NO. 95:

Admit that Applicant has not used the BROADCHIP mark in commerce in connection with any of the services in Class 42 covered in Application No. 77/855,572.

REQUEST FOR ADMISSION NO. 96:

Admit that Applicant has never advertised the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 97:

Admit that Applicant advertises the BROADCHIP mark in the United States via the website www.broadchip.com.

REQUEST FOR ADMISSION NO. 98:

Admit that Applicant has advertised the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 99:

Admit that Applicant is not currently using the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 100:

Admit that Applicant has never used the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 101:

Admit that Applicant has never shipped any products to the United States.

REQUEST FOR ADMISSION NO. 102:

Admit that Applicant has never shipped any products from the United States.

REQUEST FOR ADMISSION NO. 103:

Admit that Applicant's chips are not available in the United States.

REQUEST FOR ADMISSION NO. 104:

Admit that Applicant has documentary evidence showing that Applicant has a bona fide intent to use the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 105:

Admit that Applicant has no documentary evidence showing that Applicant has a bona fide intent to use the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 106:

Admit that Applicant has no use, no sales, no promotion, or specific plans to the use the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 107:

Admit that Applicant has sales agents in the United States.

REQUEST FOR ADMISSION NO. 108:

Admit that Applicant has no sales agents in the United States.

REQUEST FOR ADMISSION NO. 109:

Admit that Applicant has conducted market research regarding use of the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 110:

Admit that Applicant has not conducted market research regarding use of the BROADCHIP mark in the United States.

REQUEST FOR ADMISSION NO. 111:

Admit that Applicant has conducted product testing in the United States.

REQUEST FOR ADMISSION NO. 112:

Admit that Applicant has not conducted product testing in the United States.

REQUEST FOR ADMISSION NO. 113:

Admit that Applicant has retainer distributors for Applicant's Goods in the United States.

REQUEST FOR ADMISSION NO. 114:

Admit that Applicant has not retained distributors for Applicant's Goods in the United States.

REQUEST FOR ADMISSION NO. 115:

Admit that Applicant has offered Applicant's Goods for sale in connection with Applicant's Mark in the United States.

REQUEST FOR ADMISSION NO. 116:

Admit that Applicant has never offered Applicant's Goods for sale in connection with Applicant's Mark in the United States.

REQUEST FOR ADMISSION NO. 117:

Admit that Applicant has drafted business plans regarding the use of Applicant's Mark in connection with Applicant's Goods in the United States.

REQUEST FOR ADMISSION NO. 118:

Admit that Applicant has never drafted any business plans regarding the use of Applicant's Mark in connection with Applicant's Goods in the United States.

REQUEST FOR ADMISSION NO. 119:

Admit that Applicant has drafted business plans regarding the use of Applicant's Mark in connection with Applicant's Services in the United States.

REQUEST FOR ADMISSION NO. 120:

Admit that Applicant has never drafted any business plans regarding the use of

Applicant's Mark in connection with Applicant's Services in the United States.

REQUEST FOR ADMISSION NO. 121:

Admit that Applicant has conducted marketing activities regarding use of Applicant's Mark on Applicant's Goods/Services in the United States.

REQUEST FOR ADMISSION NO. 122:

Admit that Applicant has never conducted any marketing activities regarding use of Applicant's Mark on Applicant's Goods/Services in the United States.

REQUEST FOR ADMISSION NO. 123:

Admit that Applicant uses the tagline CONNECTING THE REAL WORLD in connection with Applicant's Goods/Services.

REQUEST FOR ADMISSION NO. 124:

Admit that Opposer uses the tagline CONNECTING EVERYTHING in connection with Opposer's Goods/Services.

REQUEST FOR ADMISSION NO. 125:

Admit that Applicant uses a three letter naming convention (i.e., BCT) in connection with Applicant's Goods.

REQUEST FOR ADMISSION NO. 126:

Admit that Applicant has not advertised, promoted or marketed any products or services in the United States in association with Applicant's Mark.

REQUEST FOR ADMISSION NO. 127:

Admit that Applicant knew about Opposer before adopting Applicant's Mark.

REQUEST FOR ADMISSION NO. 128:

Admit that one or more goods under Applicant's Application are identical to Opposer's Goods.

REQUEST FOR ADMISSION NO. 129:

Admit that Applicant copied goods set forth in its U.S. Trademark Application No. 77855572 from the claim of goods under one or more of U.S. trademark applications/registrations for Opposer's Marks.

REQUEST FOR ADMISSION NO. 130:

Admit that Applicant's Goods are or will be sold in the same channels of trade as Opposer's Goods.

REQUEST FOR ADMISSION NO. 131:

Admit that Applicant's Goods are or will be sold to the same customers as Opposer's Goods.

REQUEST FOR ADMISSION NO. 132:

Admit that Applicant's Goods are or will be competitive with Opposer's Goods.

REQUEST FOR ADMISSION NO. 133:

Admit that Opposer's Marks are well-recognized.

REQUEST FOR ADMISSION NO. 134:

Admit that Opposer's Marks are famous.

REQUEST FOR ADMISSION NO. 135:

Admit that Opposer's Marks are strong.

REQUEST FOR ADMISSION NO. 136:

Admit that Applicant has received communication, document or things from a third party relating to Opposer.

REQUEST FOR ADMISSION NO. 137:

Admit that Applicant has never received any communication, document or things from a third party relating to Opposer.

REQUEST FOR ADMISSION NO. 138:

Admit that You had knowledge of Opposer's Marks before You began the selection process which resulted in Your selection of the BROADCHIP mark.

REQUEST FOR ADMISSION NO. 139:

Admit that there is consumer overlap between purchasers of Your products and purchasers of Opposer's products.

REQUEST FOR ADMISSION NO. 140:

Admit that prior to selecting Applicants' Mark, Applicant was aware of Opposer's use of the mark BROADCOM.

REQUEST FOR ADMISSION NO. 141:

Admit that prior to filing Applicants' Application, Applicant conducted a trademark search that revealed registrations containing or consisting of BROADCOM owned by Opposer.

REQUEST FOR ADMISSION NO. 142:

Admit that at least one of Applicant's officers is a United States citizen.

REQUEST FOR ADMISSION NO. 143:

Admit that at least one of Applicant's officers owns or co-owns property in the United States.

REQUEST FOR ADMISSION NO. 144:

Admit that at least one of Applicant's officers has been issued a Visa or work permit or other similar authorization to be present in the United States.

REQUEST FOR ADMISSION NO. 145:

Admit that at least one of Applicant's employees is a United States citizen.

REQUEST FOR ADMISSION NO. 146:

Admit that at least one of Applicant's employees owns or co-owns property in the United States.

REQUEST FOR ADMISSION NO. 147:

Admit that at least one of Applicant's employees has been issued a Visa or work permit or other similar authorization to be present in the United States.

REQUEST FOR ADMISSION NO. 148:

Admit that at least one of Applicant's officers resides in the United States.

REQUEST FOR ADMISSION NO. 149:

Admit that at least one of Applicant's officers resides in California.

REQUEST FOR ADMISSION NO. 150:

Admit that at least one of Applicant's employees resides in the United States.

REQUEST FOR ADMISSION NO. 151:

Admit that at least one of Applicant's employees resides in California.

REQUEST FOR ADMISSION NO. 152:

Admit that Applicant has an office in the United States.

REQUEST FOR ADMISSION NO. 153:

Admit that Applicant has an office in California.

REQUEST FOR ADMISSION NO. 154:

Admit that Broadchip Semiconductor, Inc. is a related entity to Applicant.

REQUEST FOR ADMISSION NO. 155:

Admit that Broadchip Semiconductor, Inc. has an office in the United States.

REQUEST FOR ADMISSION NO. 156:

Admit that Broadchip Semiconductor, Inc. has a business address in the United States.

REQUEST FOR ADMISSION NO. 157:

Admit that Broadchip Semiconductor, Inc. has a business address in California.

REQUEST FOR ADMISSION NO. 158:

Admit that Broadchip Semiconductor, Inc. has an office in the United States.

REQUEST FOR ADMISSION NO. 159:

Admit that Wen Geng is related to Jerry Dai.

REQUEST FOR ADMISSION NO. 160:

Admit that Wen Geng is the wife of Jerry Dai.

REQUEST FOR ADMISSION NO. 161:

Admit that an officer of Applicant owns or co-owns property located at the address: 1008 Strayer Drive, San Jose, California.

REQUEST FOR ADMISSION NO. 162:

Admit that Applicant has a subsidiary in the United States.

REQUEST FOR ADMISSION NO. 163:

Admit that Applicant has a related company in California.

REQUEST FOR ADMISSION NO. 164:

Admit that Applicant has a related company in the United States.

REQUEST FOR ADMISSION NO. 165:

Admit that Applicant has a subsidiary in California.

REQUEST FOR ADMISSION NO. 166:

Admit that, at the time Applicant filed Applicants' Application, Opposer's BROADCOM mark was well-known.

REQUEST FOR ADMISSION NO. 167:

Admit that, at the time Applicant filed Applicants' Application, Opposer's BROADCOM mark was famous.

REQUEST FOR ADMISSION NO. 168:

Admit that Applicant has purchased products from Opposer.

REQUEST FOR ADMISSION NO. 169:

Admit that the word "BROAD" is fully encompassed by Opposer's Marks.

REQUEST FOR ADMISSION NO. 170:

Admit that the word "CHIP" is the generic name for at least one of Applicant's products.

REQUEST FOR ADMISSION NO. 171:

Admit that the word "CHIP" is the generic name for at least one of Opposer's products.

REQUEST FOR ADMISSION NO. 172:

Admit that Applicant's Mark is similar to one or more of Opposer's Marks.

REQUEST FOR ADMISSION NO. 173:

Admit that Applicant's Mark and Opposer's Marks are similar in appearance.

REQUEST FOR ADMISSION NO. 174:

Admit that Applicant's Mark and Opposer's Marks are similar in sound.

REQUEST FOR ADMISSION NO. 175:

Admit that Applicant's Mark Opposer's Marks are similar in commercial impression.

REQUEST FOR ADMISSION NO. 176:

Admit that Applicant's Mark and Opposer's Marks are or will be encountered by the same consumers.

REQUEST FOR ADMISSION NO. 177:

Admit that Applicant's Mark and Opposer's Mark are both used in the semiconductor industry.

REQUEST FOR ADMISSION NO. 178:

Admit that Applicant's Mark and Opposer's Mark are used in the same industry.

REQUEST FOR ADMISSION NO. 179:

Admit that Applicant is a fables semiconductor company.

REQUEST FOR ADMISSION NO. 180:

Admit that Applicant was founded in the Silicon Valley, California.

REQUEST FOR ADMISSION NO. 181:

Admit that a related entity to Applicant was founded in the Silicon Valley, California.

REQUEST FOR ADMISSION NO. 182:

Admit that Applicant has marketed Applicant's Goods/Services on the Internet.

REQUEST FOR ADMISSION NO. 183:

Admit that Broadchip Semiconductor, Inc. (California) and Applicant share common control or ownership.

REQUEST FOR ADMISSION NO. 184:

Admit that Applicant has received inquiries regarding the purchase of Applicant's goods from U.S. customers, U.S. nationals, U.S. citizens, U.S. residents or U.S. companies or entities.

REQUEST FOR ADMISSION NO. 185:

Admit that Applicant has purchased goods and/or services from U.S. citizens, U.S. nationals, U.S. companies, or U.S. entities.

REQUEST FOR ADMISSION NO. 186:

Admit agreements exist between Applicant and U.S. citizens, U.S. nationals, U.S. companies or U.S. entities.

REQUEST FOR ADMISSION NO. 187:

Admit agreements exist between officers of Applicant and U.S. citizens, U.S. nationals, U.S. companies or U.S. entities.

REQUEST FOR ADMISSION NO. 189:

Admit that Opposer and Applicant both market their respective goods and/or services on the Internet.

REQUEST FOR ADMISSION NO. 190:

Admit that, at the time Applicant filed Applicant's Application, Applicant did not have a bona fide intention to use Applicant's Mark in connection with Applicant's Goods/Services.

REQUEST FOR ADMISSION NO. 191:

Admit that, at the time Applicant's Application was published, Applicant did not have a bona fide intention to use Applicant's Mark in connection with Applicant's Goods/Services.

REQUEST FOR ADMISSION NO. 192:

Admit that Applicant does not intend to ship goods to the United States.

REQUEST FOR ADMISSION NO. 193:

Admit that Applicant does not intend to sell goods in the United States.

REQUEST FOR ADMISSION NO. 194:

Admit that Applicant does not intend to provide services in the United States.

REQUEST FOR ADMISSION NO. 195:

Admit that an officer of Applicant owns or co-owns property located at the address:
14595 W. Lisbon Lane, Surprise, Arizona.

REQUEST FOR ADMISSION NO. 196:

Admit that Applicant is aware that distributors or brokers offer Applicant's Goods to U.S. customers, U.S. citizens, U.S. residents, or U.S. customers or entities, via the Internet or otherwise.

REQUEST FOR ADMISSION NO. 197:

Admit that Applicant's English language website is intended to target English language markets, including, but not limited to, the U.S.

REQUEST FOR ADMISSION NO. 198:

Admit that Applicant's English language business cards are intended to target English language markets, including, but not limited to, the U.S.

REQUEST FOR ADMISSION NO. 199:

Admit that Applicant's English language mark is intended to target English language markets, including, but not limited to, the U.S.

REQUEST FOR ADMISSION NO. 200:

Admit that Applicant's English language trade name is intended to target English language markets, including, but not limited to, the U.S.

REQUEST FOR ADMISSION NO. 201:

Admit that Broadchip Technology Group Ltd. was founded in the Silicon Valley.

REQUEST FOR ADMISSION NO. 202:

Admit that Applicant designs semiconductors in the U.S.

REQUEST FOR ADMISSION NO. 203:

Admit that a Google search for "BROADCOM CHIP" yields over 7 million hits.

REQUEST FOR ADMISSION NO. 204:

Admit that www.broadcomchips.com leads to Opposer's website.

REQUEST FOR ADMISSION NO. 205:

Admit that Applicant has never received compensation (monetary or otherwise) as a result of the sale of Applicant's Goods in the U.S.

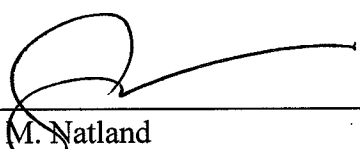
REQUEST FOR ADMISSION NO. 206:

Admit that Applicant has received compensation (monetary or otherwise) as a result of the sale of Applicant's Goods in the U.S.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

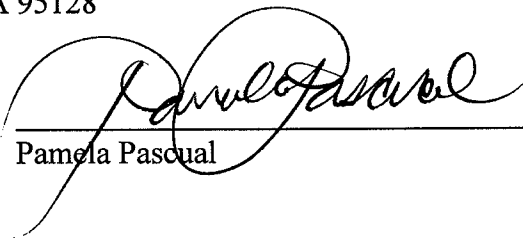
Dated: September 2, 2011

By: 
Susan M. Natland
Lynda Zadra-Symes
2040 Main Street, 14th Floor
Irvine, CA 92614
(949) 760-0404
Attorneys for Opposer, Broadcom Corporation

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing OPPOSER'S FIRST SET OF REQUESTS FOR ADMISSIONS NOS. 1-206 upon Applicant's counsel by depositing one copy thereof in the United States Mail, first-class postage prepaid, on September 2, 2011 addressed as follows:

James F Landrum Jr.
LANDRUM & COMPANY INC.
560 S. Winchester Blvd., 5th Floor
San Jose, CA 95128



Pamela Pascual

11861634/090211